



Meridian Solar Farm

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Post-Submission Application
Documents

8.33 Applicant's Comments on
Local Impact Reports

APFP Regulation 5(2)(q)

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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 Local Impact Reports submitted by South Holland District Council and Lincolnshire County Council concerning Meridian Solar Farm (the Scheme).
- 1.1.2. The Local Impact Reports have been prepared by the local authorities in accordance with Section 60 of the Planning Act 2008. In determining the DCO application under Section 104 of the Planning Act 2008, the Secretary of State must have regard to the impacts detailed by the local authorities in the Local Impact Reports.
- 1.1.3. All matters raised within the Local Impact Reports have been responded to by setting out the Applicant's position on the matter at the time of writing. In some cases, the Applicant has previously responded to these points within the **Relevant Representations Report** [REP1-047]. Where this is the case, and no new or different points are made, the Applicant has cross-referred to the relevant section of the report rather than reproducing the response in full.
- 1.1.4. Likewise, where matters are already covered within a Statement of Common Ground (SoCG) with the local authority, the Applicant has not reproduced those responses, and has cross-referenced to the relevant SoCG.

2. South Holland District Council

2.1. Agriculture and Soils

Table 2-1: Agriculture and Soils

Reference	Topic	Matter Raised	Applicant's Response
1.1	Loss of sensitive land	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 loss of mostly high or very highly sensitive land is a concern. 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.	The Applicant's response to this matter is set out within Table 2-2 of the Relevant Representations Report [REP1-074], in response to SHDC-001 and SHDC-002.
1.2	Food security	The impact of losing land for food production for at least 40 years is considered significant with agricultural sectors in South Holland 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's response to this matter is set out within Table 2-2 of the Relevant Representations Report [REP1-074], in response to SHDC-004.

Reference	Topic	Matter Raised	Applicant's Response
1.3	Soil quality	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 soils is required with justification why other and lesser graded land areas have not been chosen.	The Applicant's response to this matter is set out within Table 2-2 of the Relevant Representations Report [REP1-074], in response to SHDC-002.

2.2. Landscape and Visual Impact

Table 2-2: Landscape and Visual

Reference	Topic	Matter Raised	Applicant's Response
2.1	Landscape and Visual impacts	The Proposed Development would introduce extensive energy infrastructure into this open agricultural landscape, including solar panels, substations and an approximately 13 km long 400 kV overhead grid connection.	Applicant's response to this matter is set out within Table 2-2 of the Relevant Representations Report [REP1-074], in response to SHDC-013.
2.2	Landscape and Visual impacts	The Applicant's LVIA identifies numerous significant adverse landscape and visual effects during construction and operation. Some significant effects would remain at Year 15 after mitigation planting has established.	

Reference	Topic	Matter Raised	Applicant's Response
2.3	Landscape and Visual impacts in South Holland	Within South Holland, the principal impacts would include: • a reduction in the openness and rural character of the landscape; • the introduction of additional industrial and utilitarian features; • increased vertical emphasis and visual clutter from pylons and overhead conductors; • effects upon open horizons and the characteristic Fenland skyline; and • significant views experienced by residents and users of local roads and public rights of way. The height and geographical extent of the overhead connection mean that it would be visible across a wide area. The pylons and conductors could not be effectively screened by planting and would remain prominent against the skyline in a number of views.	The potential effects of the Scheme on landscape character and visual amenity, including effects on openness, rural character, views, and the characteristic Fenland skyline, have been assessed within 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 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.
2.4	Residential Visual Amenity Assessment	The Council is concerned that a Residential Visual Amenity Assessment has not been undertaken. Several residential properties are situated close to the Proposed Development,	See Table 2-2 of the Relevant Representations Report [REP1-074], SHDC-026 to SHDC-028 for the Applicant's response.

Reference	Topic	Matter Raised	Applicant's Response
		and the Applicant's LVIA identifies significant effects for representative residential receptors, including effects which would remain significant at Year 15. While a significant visual effect does not necessarily mean that the Residential Visual Amenity Threshold would be crossed, the proximity of properties, scale of development, open landscape and limited screening indicate that a property-specific assessment would have been appropriate.	
2.5	Residential Visual Amenity Assessment	The information provided does not clearly demonstrate how the outlook, orientation, principal rooms, gardens and existing screening of individual properties were considered. The Council therefore considers that the conclusion that the Residential Visual Amenity Threshold would not be approached has not been sufficiently justified.	
2.6	Overhead Line	The Council is particularly concerned about the effects of the proposed 400 kV overhead Grid Connection Route.	The Applicant acknowledges SHDC's concerns. See Table 2-2 of the Relevant Representations Report [REP1-074] for the Applicant's full response.
		The Applicant acknowledges that undergrounding would largely avoid the permanent landscape and visual effects	As set out within Written Summary of Oral Submissions at ISH1 [REP1-098], the starting point for the Applicant's design approach has been the

Reference	Topic	Matter Raised	Applicant's Response
		associated with pylons and overhead conductors. However, the alternatives assessment principally compares a wholly overhead route with a wholly underground route.	policy position set out in paragraph 2.9.21 of National Policy Statement for Electricity Networks (NPS EN-5), which states that overhead lines should generally be the strong starting presumption for electricity network infrastructure. Whilst some significant adverse landscape and visual effects arise from the Grid Connection Route, those effects are generally typical of overhead line infrastructure and do not trigger a requirement to underground. The Applicant has incorporated targeted undergrounding where justified by site specific circumstances. A short underground section is proposed where the Grid Connection Route crosses an existing 132kV overhead line and where oversailing that infrastructure was determined to be technically unfeasible, with CSECs facilitating the transition. A further area for potential undergrounding has been identified within Work No. 14 north of High Road, where the Grid Connection may need to be undergrounded to accommodate cumulative NGET schemes. ES Chapter 3: Alternatives and Design Evolution [APP-054] and the Design Approach Document [APP-268] describe the alternatives and design evolution considered for the Grid Connection Route.

Reference	Topic	Matter Raised	Applicant's Response
2.7	Overhead Line	There is limited evidence that a landscape-led hybrid option was assessed, targeting undergrounding at those sections where permanent landscape and visual effects would be greatest. A short underground section near Delgate Bank is proposed to address an engineering constraint, demonstrating that partial undergrounding is technically possible.	The Applicant notes SHDC'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 NPS 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.
2.8	Overhead Line	The Council considers that the discounting of undergrounding has not been supported by a sufficiently transparent assessment of reasonable hybrid alternatives or of the landscape and visual benefits that partial undergrounding could provide.	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 <i>"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"</i> . However, section 3.5.28 goes on to conclude that <i>"With due regard to the environmental effects, the receptors that may experience likely residual significant effects from an overhead line are landscape and visual</i>

Reference	Topic	Matter Raised	Applicant's Response
			<i>receptors, and designated heritage assets use 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".</i> 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. 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. 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

Reference	Topic	Matter Raised	Applicant's Response
			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. 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. A short underground section is however proposed where the Grid Connection Route crosses an existing 132kV overhead line near Delgate Bank, where oversailing that infrastructure was determined to be technically unfeasible, with CSECs facilitating the transition. A further area for potential undergrounding has been identified within Work No. 14 north of High Road, where the Grid Connection may need to be undergrounded to accommodate cumulative NGET schemes.
2.9	Mitigation	Proposed planting would provide some screening of lower-level infrastructure but would not mitigate views of the pylons and conductors. The Applicant acknowledges that	See Table 2-2 of the Relevant Representations Report [REP1-074], SHDC-017 and SHDC-018 for the Applicant's full response.

Reference	Topic	Matter Raised	Applicant's Response
		significant landscape and visual effects cannot be fully mitigated.	
2.10	Cumulative visual effect	The Proposed Development would also be experienced alongside existing and proposed energy infrastructure. This could result in a substantial concentration of pylons, overhead lines and substations, further industrialising the landscape. The cumulative relationship between these projects should therefore be carefully coordinated and assessed.	The Applicant notes SHDC's concerns on the cumulative landscape and visual effects that the Scheme could have alongside existing and proposed energy infrastructure. 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]. Cumulative landscape and visual effects with other developments are set out within ES Appendix 12-7: Landscape and Visual Cumulative Assessment [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

Reference	Topic	Matter Raised	Applicant's Response
			cumulative schemes together is considered to be significant. Applicant's full response is provided within Table 2-2 of the Relevant Representations Report [REP1-074], SHDC-029 to SHDC-032,
2.11	Summary	The Council recognises the renewable energy benefits of the Proposed Development. However, it would result in extensive and, in some locations, long-term significant adverse landscape and visual effects within South Holland. The Council's principal concerns are the effects of the 400 kV overhead connection, the limited scope for effective mitigation, the absence of a Residential Visual Amenity Assessment, insufficient consideration of partial undergrounding and the potential cumulative effects of other energy infrastructure.	Specific responses to the concerns raised by SHDC in relation to landscape and visual matters raised are provided in rows above.

2.3. Noise and Vibration

Table 2-3: Noise and Vibration

Reference	Topic	Matter Raised	Applicant's Response
3.1	Construction and operational noise and vibration	There is the potential for construction and operational noise and vibration to impact on human health and result in a negative impact.	Impacts on health during the construction phase have been assessed within ES Chapter 10: Human Health [APP-061], including potential effects associated with noise and vibration. The assessment concluded that overall, the likely effect on health arising from noise and vibration effects during the construction phase of the Scheme is assessed to be short-term temporary minor adverse (not significant) for the general population and vulnerable groups and during the operation phase likely effect on health arising from impacts on noise is assessed to be long-term minor adverse (not significant) for both the general population and vulnerable groups. 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 Outline Construction Environmental Management Plan (OCEMP) [REP1-061] and the Outline Operational Environmental Management Plan (OOEMP) [REP1-063], to reduce the potential noise effects.

Reference	Topic	Matter Raised	Applicant's Response
3.2	Operational noise	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.	See Table 2-2 of the Relevant Representations Report [REP1-074], SHDC-038 to SHDC-040 for the Applicant's full response.
3.3	Construction noise	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 Application is required to provide assessment and evidence for the mitigation of these impacts.	See Table 2-2 of the Relevant Representations Report [REP1-074], SHDC-041 for the Applicant's full response.

2.4. Socio-Economics

Table 2-4: Socio-Economics

Reference	Topic	Matter Raised	Applicant's Response
4.1	Employment	The scheme provides a negligible direct employment benefit of only 5 net local jobs over its 40-year lifespan, failing to offset the disruption to the agricultural supply chain.	As outlined within ES Chapter 14: Socio-Economics and Land Use [APP-065], the likely impacts on existing agricultural employment including the supply chain have been considered within the assessment of net employment effects

Reference	Topic	Matter Raised	Applicant's Response
			during operation. As set out in Table 14-23, impacts on businesses in the supply chain (referred to as indirect and induced impacts) are covered through the application of a multiplier to the number of direct (on-site) jobs. The Solar Development Areas are farmed by the landowners and there are no tenant farmers who will lose their jobs. The landowners will continue to generate income from their land during construction and operation of the Scheme. There may be some contractors who undertake farming activities on the land, but it is very likely that such contractors would not be entirely reliant on these farms for employment. Any loss of agricultural employment is therefore likely to be minimal. Within the Grid Connection Route and Inter-Array Connections, disruption to farming activities would largely be temporary and short term. A more detailed assessment of indirect effects on the agricultural supply chain would require further research and / or consultation, which would not be proportionate. 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

Reference	Topic	Matter Raised	Applicant's Response
			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. 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 [REP1-072] provides a framework for maximising 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) of the Draft DCO [REP1-006]. 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

Reference	Topic	Matter Raised	Applicant's Response
			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.
4.2	Community Fund	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.	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 funded projects may focus on promoting economic development and therefore to delivery of SSCEP objectives. The Applicant submitted further information on the Community Benefit Fund as part of Deadline 1 within Post ISH1 Note - Community Benefit Fund [REP1-100].
4.3	Socio-economic impact	We will continue to work with the Developer to consider the socio-economic impact of the proposal and we are requesting areas of clarification.	The Applicant's clarifications to matters raised by SHDC have been provided within Table 2-2 of the Relevant Representations Report [REP1-074] and within this document. The Applicant will continue

Reference	Topic	Matter Raised	Applicant's Response
			tracking engagement and agreements reached with SHDC through the Statement of Common Ground process.
4.4	Community Benefit Fund	The information provided to date is considered inadequate as we still have concerns over the administration of the fund with the current funding lacking formal guarantees within the DCO.	The Applicant submitted further information on the Community Benefit Fund as part of Deadline 1 within Post ISH1 Note - Community Benefit Fund [REP1-100].
4.5	Supply chain	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 Applicant has considered the socio-economic effects of the Scheme on agriculture in ES Chapter 14: Socio-Economics and Land Use [APP-065], and its response to Comment Reference 4.1 sets out the basis for its conclusions. In summary, the Solar Development Area is farmed by the landowners, who have entered into voluntary agreements with the Applicant and will receive diversified income from the Scheme, and there are no tenant farmers in these areas. No material loss of agricultural employment is anticipated, including within the supply chain, and overall the Scheme is estimated to generate a net gain of 11 FTE jobs during operation. Effects along the Grid Connection Route and Inter-Array Connections are temporary, with land reinstated in accordance

Reference	Topic	Matter Raised	Applicant's Response
			with the Outline Soil Management Plan [REP1-068].
4.6	Community development fund	From an economic and social perspective, the Council would like to see the development doing as much as it possibly can to maximise the benefits for local people and businesses for hosting this infrastructure. We are still unsure as to how any potential community development fund would be administrated and indeed how it would be delivered through the planning NSIP process.	This comment is noted. The Outline Skills, Supply Chain and Employment Plan [REP1-072] provides a framework for maximising benefits for local residents and businesses. These approaches will contribute to supporting local employment and the wider community as a whole. 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. 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 funded projects may focus on

Reference	Topic	Matter Raised	Applicant's Response
			promoting economic development and therefore to delivery of SSCEP objectives. The Applicant submitted further information on the Community Benefit Fund as part of Deadline 1 within Post ISH1 Note - Community Benefit Fund [REP1-100].

2.5. Traffic and Transport

Table 2-5: Traffic and Transport

Reference	Topic	Matter Raised	Applicant's Response
5.1	Traffic and transport impacts	Regarding the traffic and transport impacts we would adopt the position of Lincolnshire County Council Highway Authority.	The Applicant notes this comment.
5.2	Access roads	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 this comment. See Table 2-2 of the Relevant Representations Report [REP1-074], SHDC-047 for the Applicant's full response.
5.3	Traffic and transport assessment	Lincolnshire County Council act as highways Authority and may comment directly on the proposed development. Having reviewed the information put forward, there appear to be omissions including a detailed construction management plan, the impacts of the construction phase over two to three years and	The Applicant's full response is provided in Table 2-2 of the Relevant Representations Report [REP1-074], SHDC-046 to SHDC-051. In regard to the SHDC's comment on the omissions of the impacts of the construction phase over two to three years, the Applicant can confirm that the impacts of construction have

Reference	Topic	Matter Raised	Applicant's Response
		how remediation and reinstatement works will take place following construction, in particular at field access points.	been assessed in the ES in accordance with the indicative programme provided in Plate 2-13 of ES Chapter 2: The Scheme [AS-017].

3. Lincolnshire County Council

3.1. Site Selection and Alternatives

Table 3-1: Site Selection and Alternatives

Reference	Topic	Matter Raised	Applicant's Response
1.1	Clarity around the initial siting zones	Sections 3.3.4 to 3.3.12 of the SSR [APP-264] describe the Applicant's discussions with NESO in 2021, and then NGET, over a potential grid connection point. NGET advised that a new, large-scale substation was planned to be constructed in Lincolnshire near to the existing overhead line between Spalding and Walpole, with a footnote indicating that NGET had not yet indicated the need for two substations at Weston Marsh. At paragraph 3.3.6, it is stated that <i>'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'</i> . It is not clear from the text what area the <i>'agreed siting zone'</i> refers to or at what <i>'point in time'</i> in the site selection process this agreement refers to, therefore clarity from the Applicant on these two points would be welcomed.	The Applicant has provided a response to these points at Section 2.3 of the Relevant Representations Report [REP1-047]. The Applicant has subsequently submitted Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35) which provides further details of site selection including a timeline of engagement with NGET, the siting zone for the Weston Marsh substation, and the area of search from this point.
1.2		The SSR then describes the offer of a 750MW grid connection following further engagement with NGET (paragraph 3.3.7), with confirmation of availability and confirmed capacity at the PoC	

Reference	Topic	Matter Raised	Applicant's Response
		enabling that location to be the starting point of an area of search for the scheme. Again, it is not clear what 'location' is being referred to here. At 3.3.9 the Applicant states that the 'exact location' of the substation was not yet identified by NGET but does refer to a graduated swathe search area to the northeast of Spalding used as part of NG's early 2024 consultation, reproduced at Figure 3.1 in the SSR.	
1.3		Reference is then made at para 3.3.10 to the search area for potential PV sites ' <i>on the basis of connection to a substation which could be located between Spalding in Lincolnshire and Walpole in Norfolk</i> '. Similarly, at 3.3.15 it states that ' <i>The Applicant did not adopt a rigid search area as the exact location of the Weston Marsh Substation was not confirmed at that point in time but sought to identify available land holdings as close as practicable (approximately 15km) to the anticipated location of the PoC, which was understood to be between Spalding and Walpole</i> '. Clarification from the Applicant to identify what ' <i>point in time</i> ' this statement at 3.3.15 is referring to would help to aid overall understanding of the sequence of decisions that were taken in identifying the chosen location for solar PV.	

Reference	Topic	Matter Raised	Applicant's Response
1.4		Overall, it is not clear from the explanation given why the search area for potential PV sites repeatedly referred to was not any closer to the proposed Weston Marsh substation, rather than incorporating a large swathe of land approximately 24 km in length between Spalding and Walpole, which lies some distance south / southeast of the Weston Marsh preferred siting zone reproduced at Figure 3.1 in the SSR.	
1.5		In combination with the reference to 'suitable land holdings' in paragraph 3.3.11, and the (rescinded) offer of a 'tee-in' connection onto the planned Grimsby to Walpole scheme in mid-2024, it is reasonable to conclude that the area of search used for PV sites (between Spalding and Walpole, less so the WMSS proposed location) was more a function of landowner willingness and land availability discussions at the time rather than proximity to the grid connection point or consideration of any other environmental constraint of the type listed in 7.8 above.	The Scheme originated from an initial land opportunity which subsequently aligned with the availability of a 750 MW connection opportunity associated with the emerging Weston Marsh substation. The location of that connection opportunity was a key consideration in defining a realistic area of search, reflecting the importance of the network connection recognised in EN-3 and the practical implications of construction and operating a transmission-connected generating station of this scale. In identifying land suitable for further consideration, the Applicant also had regard to the strategic distribution of environmental, planning and engineering constraints surrounding the Point of Connection (PoC), including internationally and nationally designated landscape nature conservation features, agricultural land quality, flood risk and
1.6		Whilst identification of suitable landholdings and landowner willingness is an important factor in determining site location for such developments, the Council considers that, in view of their significant scale and potential impacts of these	

Reference	Topic	Matter Raised	Applicant's Response
		projects, there must be evidence of a robust preliminary and overarching strategic land use decision framework being employed that fully encompasses assessment of a range of environmental constraints. Such an approach should demonstrate how, for example, the initial search area chosen had sought to avoid areas of high flood risk or areas of higher likelihood of BMV land at the outset in order to demonstrate adherence to relevant land use policies	engineering constraints associated with the delivery of transmission infrastructure. The Applicant has provided further evidence in Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35) to respond to these points.
1.7		As raised in its Relevant Representation, the Council suggests that the timeline of decisions with respect to search areas for potential PV sites is somewhat unclear in this section of the SSR, 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 sequencing and decision making over this period, the sequence of events remains unclear and further clarity from the Applicant would be welcomed.	
1.8	Reference to 'smaller land parcels' being	At paragraph 3.2.2 of the SSR, the applicant references three fundamental attributes for large scale solar, one of which is existence of sufficient land to deliver the scheme and meet the scale of the Scheme's aims. The SSR goes on to state at	The Applicant has provided further evidence in Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35) to respond to why smaller and more dispersed land

Reference	Topic	Matter Raised	Applicant's Response
	discounted as alternatives	paragraph 3.3.13: ' <i>Larger land holdings aid mitigating commercial and deliverability risk associated with multi-party negotiations and provide flexibility for design. Large blocks of land within the holdings are beneficial for solar development PV as they can facilitate a large installation. The applicant sought to identify large land holdings (or approximately 300 – 400 acres)</i> '. This range is equivalent to 121 – 161 ha. The Council would firstly seek confirmation from the Applicant that the range quoted is correctly referring to acres, as opposed to ha – given the PV area parcel sizes eventually chosen (197 – 335 ha, or 487 – 828 acres), it would appear that the range should be hectares. Notwithstanding, in the following paragraph it is stated that smaller land parcels are not considered as a reasonable alternative since they would not be able to deliver the scale of energy generation enabled for the grid connection, in this case 750MW.	parcels were not taken forward as part of the Scheme. In summary: - Reviewing the availability of sites within Flood Zone 1, they are generally fragmented and dispersed. A configuration relying upon multiple separated areas of lower-risk land would also need to address the additional connection infrastructure required between those areas and the Scheme's 400kV substation. Suitability of a site cannot therefore be determined solely by adding together the smaller areas of individual Flood Zone 1 parcels in the area of search. - If the development were distributed across a series of smaller isolated sites, they may be reduced flexibility within the overall landholding to respond to constraints identified through survey work and detailed design. Environmental buffers, drainage features, landscaping, biodiversity enhancement areas, access tracks and electrical infrastructure all reduce the amount of land available for solar PV panels.
1.9		No definition is given to the term ' <i>smaller</i> ' in the sentence. LCC 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 this scale, therefore an explanation as to why this approach was discounted by the Applicant would be	With regards to the use of non-continuous sites, such as Cottam, the Applicant notes that the Meridian

Reference	Topic	Matter Raised	Applicant's Response
		beneficial. The Council would highlight that other solar projects in Lincolnshire have successfully combined smaller, non-contiguous sites, and these have been considered viable by their developers. For example, the 600MW Cottam Solar project consists of 4 land parcels, comprising Cottam 1 - a discontinuous ring of sub-sites (totalling 812.1ha), and Cottam 2, 3a and 3b, single sites of 168ha, 132ha and 73ha respectively linked by a number of cable route corridors and connecting to the National Grid substation at Cottam Power Station.	Scheme comprises four land parcels which are connected by cable route corridors.
1.10		Paragraph 3.3.18 states that engagement and consultation since initial site selection has not identified any landholdings of suitable size closer to the PoC. With respect to the previous comment on conglomeration of smaller land parcels, whilst the Council appreciates that there is no upper or lower limit in the guidance on parcel size, it assumes that this subsequent engagement and consultation referred to was premised on landholdings above a certain size. However, clarity from the Applicant on this point would be welcomed since, in terms of site selection, by adopting a threshold lower limit, the options for site suitability are immediately reduced, overriding other factors which potentially could	The Applicant has provided further evidence in Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35) regarding the scale of the land required for the Scheme. The Applicant, an established solar and BESS developer across England and Scotland, was approached in 2021 by a landowner interested in the development of solar PV generation at Land Parcel D. This site was approximately 260 hectares (ha) which would be suitable for generating approximately 240 MW of electricity. In order to maximise the available grid connection, the Applicant therefore needed to identify available sites

Reference	Topic	Matter Raised	Applicant's Response
		have resulted in a more sustainable or policy compliant scheme.	to fulfil the full 750 MW offer (approximately 1,000 – 1,200 ha in total). A guiding principle for site identification was the consideration of deliverability and availability of land for development. The Applicant sought to identify large land holdings (of approximately 120 to 160 hectares) with close proximity to one another. This is because larger land holdings aid mitigating commercial and deliverability risk associated with multi-party negotiations and provide flexibility for design. Large blocks of land within the holdings are also beneficial for solar PV development as they enable cohesive designs, without loss of land to necessary buffers or other design constraints. A design which incorporates several smaller parcels as opposed to larger, cohesive parcels lose resulting developable area, as the developable area is smaller than the initial field size due to the requirement for buffers and the consideration of other design constraints. Larger areas of land allow the Applicant to subsequently refine the design within that envelope once the characteristics of a site are better understood. The Applicant didn't immediately discount all smaller sites, but for the reasons discussed in response to 1.8

Reference	Topic	Matter Raised	Applicant's Response
			and 1.9 above, larger land holdings better suited the Applicant's objectives for the Scheme.
1.11	How Agricultural Land Classification (ALC) and Land Type influenced site selection decisions	With respect to the text at paragraph 3.3.20, it is unclear to the Council what steps were taken by the Applicant in the consideration of previously developed, brownfield, contaminated and industrial land. There is reference to the majority of the land near the PoC being ' <i>undeveloped and agricultural</i> ' (with no brownfield land being reasonably available that is of a size that could accommodate NSIP scale solar development), but this is no different from the location ultimately selected. Further clarity from the Applicant would be welcomed here to demonstrate how compliance with paragraph 2.10.21 of EN-3 has been achieved in respect of site selection.	Available brownfield sites at the time were either all within existing built up areas or did not contain any sites of a suitable size for further consideration, with the largest available site at the time being 2.58 ha in the South Holland District Council area, substantially less than the Applicant's aim for sites of 120 – 160 ha.
1.12		Paragraph 3.3.24 refers to the land around the PoC as likely to be in an area of excellent (grade 1 ALC) (darker blue) while land further out, to the south, is mapped as being of 'Very Good' (grade 2) quality, which is where opportunities for land for PV were considered. Whilst the Council can appreciate that the land further south on which the solar PV is proposed is, relatively speaking, not as high a grade	The Applicant has provided further explanation at Section 5.5 Agricultural Land Quality in Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35). Natural England's Provisional ALC Mapping identifies Grade 1 land closest to Spalding and Walpole, with a greater likelihood of Grade 2 land to the south and west. As illustrated at Figure 3-2 of Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35), there is very

Reference	Topic	Matter Raised	Applicant's Response
		as that at the PoC, the land is still provisionally mapped as being high quality, grade 2 BMV agricultural land, which raises immediate tension with policy, as laid out in section 2 (Planning Policy Context) of the document.	little Grade 4 or 5 land within a reasonable distance of the PoC, demonstrating the lack of alternatives in the vicinity of the PoC with a lower ALC grading that the proposed site.
1.13		With reference to para 3.3.26, whilst it is accepted that avoidance of BMV land in and around the PoC is difficult, given the prevalence of high quality agricultural land in the area, if reference is made to figures 3-4 and 3-5 (Predictive Land Assessment), 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%), as opposed to a high likelihood (>60%).	The Applicant has provided at a response at Row LCC-004 in Section 2.3 of the Relevant Representations Report [REP1-047]. At this scale, Grade 3 cannot be distinguished into Grades 3a and 3b. Therefore, the very large majority of land surrounding the PoC has potential to be best and most versatile agricultural land (albeit it lesser grade that the soils closest to the PoC). At a macro level, it would not be possible to identify an area approximately 15km from the PoC that is of a suitable size without potentially impacting BMV land.
1.14		Utilising a 15km envelope from the Weston Marsh PoC search area (as referenced at 3.3.15), then in a westerly direction there is a higher likelihood of encountering lower grade soils at or about this range. 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-' or 'strategic-' level site selection process which this section of the document deals with (in	Land to the far west of the PoC that is identified as Grade 3 is beyond the 15km search area (approximately 24km), and would also require the transmission infrastructure to overcome engineering constraints including crossing the River Welland. The assessment within Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35) demonstrates that these considerations need to be assessed collectively rather than in isolation, taking into account both the

Reference	Topic	Matter Raised	Applicant's Response
		comparison with the local level site selection process in section 3.4). Further clarity from the Applicant on why this strategic-level approach to site selection to avoid high grade BMV was not explored would be helpful here.	characteristics of the land required to host the Solar Development Area and the infrastructure required to connect it to the transmission network.
1.15		There is a very obvious discrepancy between the results of the ALC survey submitted with the application (which map 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 grade 3b mapping have been posed to the applicant and further discussions on this topic with the applicant are anticipated during the course of the examination.	The Applicant's responses to the detailed comments received on the ALC survey and mapping are provided within Table 3-18 and Table 3-19 of this document.
1.16		The Council's broader concerns over the ALC survey and interpretation feed into its more limited commentary on site-level decisions that have been made by the Applicant predicated on its ALC survey results. With a significant question mark over the extent of mapped ALC subgrade 3b, LCC would wish to seek resolution and agreement in particular on the extent of BMV/non-BMV land, before making detailed comments on the Applicant's	The Applicant notes the comments around the ALC survey and the Applicant's responses to the detailed comments received on the ALC survey and mapping are provided within Table 3-18 and Table 3-19 of this document. The Applicant would note that LCC's critique of the ALC survey is based on predictive mapping and historic data. Predictive ALC mapping assumes

Reference	Topic	Matter Raised	Applicant's Response
		infrastructure siting decisions. As highlighted in the Council's RR [RR-111], there is a significant discrepancy between what the predicted land assessment plans show (at figures 3-4 and 3-5 of the SSR) versus what the ALC survey plans show (figs 3-10 and 3-11). Paragraph 3.4.13 states that the amount of BMV within the Order Limits lies somewhere in the range of 35.2% and 39.2%, depending on whether field average or auger point approach is taken, which would appear a very low percentage when judged against the provisional and predicted extent of BMV as presented in Figures 3-4, 3-5 and 3-6.	effective under-drainage of soils, which then allows the land to achieve BMV status. However, drainage requires maintenance; the effectiveness of tile drains and mole drains should not be assumed. Survey evidence indicates that soil wetness was the limiting factor in some areas. For example, root channels into lower soil layers were not observed. The functioning of tile drains, whether perforated plastic or clay, diminishes over time. Tile drains are used in tandem with unlined mole drains that deteriorate through collapse and silting. Differences between modelled outputs, historical records and the survey would be expected if under-drainage was not delivering to its full potential. For this reason, predictive mapping and historic data is less reliable than recent field survey. The ALC survey results presented within ES Appendix 5-2 [REP1-028] and ES Appendix 5-3 [REP1-030] provide higher resolution survey information across the Solar Development Area, which is representative of existing, rather than the predictive model conditions. The Applicant would also note that large

Reference	Topic	Matter Raised	Applicant's Response
			areas of Grade 3b land were identified by LRA¹ within the Solar Development Area as part of the reconnaissance survey in 2023-2024. As such, two separate surveys by separate surveyors have concluded Grade 3b ALC classification land within parts of the Site, particularly within Land Parcel D. Furthermore, Appendix A of this document provides cropping information for the Solar Development Area over the past years. This cropping data is not characteristic of Grade 1 and Grade 2 ALC land throughout the Site, as would be suggested by the predictive mapping, but is indicative of Grade 3a and Grade 3b land within parts of the Site.
1.17		Although there are areas of Flood Zone 1 to the south / southeast of Weston, the Applicant states that these could not fully accommodate an NSIP scale solar development of the scale required, taking into account wider sustainable development objectives. The text cross-references to the	The Applicant has provided further information regarding the consideration of flood risk within Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35). Additionally, the Applicant has provided further explanation of how it has applied the Sequential and

¹ 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]

Reference	Topic	Matter Raised	Applicant's Response
		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]. Further comments on the application of the sequential and exception tests have been made in section 13 of the LIR.	Exception Tests at Post ISH1 Note: Sequential and Exception Tests (Doc Ref. 8.36).
1.18		On a technical point, with reference to the area to the west of the PoC, figure 3-8 of the SSR (Key planning and environmental designations), it is unclear what the large expanse of land encompassing Bourne and large 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 and what constraints it poses to the proposed development would be welcomed.	The Applicant has provided a response at LCC-007 in Section 2.3 of the Relevant Representations Report [REP1-047]. 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 Kesteven District Council.
1.19	Alternatives	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	The Applicant's response on why vertical bifacial panels would not be suitable for the Site is provided within Table 2-3 of the Relevant Representations Report [REP1-074] and summarised within Written Summary of Oral Submissions at ISH1 [REP1-098].

Reference	Topic	Matter Raised	Applicant's Response
		between energy generation and agricultural production, providing dual land use efficiency benefits. It would be useful to understand the Applicant's position with respect to this emerging technology in the context of their application, particularly in view of the location of the proposed development in an area that is demarcated on Natural England's ALC plans of comprising significant amounts of high quality agricultural land.	
1.20	Summary	In summary, the Council raises a number of concerns regarding the Applicant's site selection process, as set out above, primarily the sequencing and timing of decisions around search areas, discussions with NESO / NGET and landowners and the preference for a contiguous site and avoidance of smaller land parcels, and evidence that the site selection process has been thorough in consideration of alternatives that could potentially deliver a site utilising less good quality agricultural land and avoiding high flood risk areas. On the matter of alternatives studied, commentary from the Applicant on the omission of consideration of a bifacial agrivoltaic system, in the specific context of an area with a high proportion of good quality agricultural land, would be welcomed.	Applicant's responses to the matters raised are provided in rows above.

3.2. Grid Connection and BESS

Table 3-2: Grid Connection and BESS

Reference	Topic	Matter Raised	Applicant's Response
2.1	Grid Connection	An application for substation A was made to SHDC in May 2026 under the TCPA, reference H22 0466-26, to essentially accelerate that development to facilitate a connection for the Outer Dowsing Offshore Wind project, which received its DCO earlier in 2026. The Council has responded to a consultation from SHDC on the application for substation A, raising concerns around landscape and visual impact, the need for further information in respect of ecological and archaeological interest, and the potential for cumulative and protracted amenity harm to local communities arising from an extended period of construction, with disturbance from development of substation A preceding the wider works associated with the Grimsby to Walpole project. A question has also been raised in respect of EIA screening and whether the original opinion adopted by SHDC takes full account of a parallel Section 37 application (under the Electricity Act) for	The Applicant notes LCC's position. From the perspective of the Applicant, the proposals submitted by NGET under TCPA application ref. H22 0466-26 are broadly the same as published as part of the statutory consultation for the Grimsby to Walpole DCO, and therefore, have been appropriately considered within the cumulative effects assessment of the ES.

Reference	Topic	Matter Raised	Applicant's Response
		related infrastructure transmission works, such that they are treated as one project along with the substation A development. The TCPA application for substation A remains undetermined.	
2.2		The Council would suggest that the significant conflicts with the Grimsby to Walpole project need to be examined in further detail, and should the ExA recommend approval of a DCO for Meridian, then robust contingency should be applied to compensate for potential delays to the separate development at Weston Marsh substation. It is recommended that should the SoS be minded to grant consent for Meridian, that a requirement be imposed to restrict the commencement of the development, including any preparatory works, until such time as consent has been secured for a connection into the Weston Marsh substation.	The Applicant notes the Council's concerns regarding potential interactions with the Grimsby to Walpole project. As outlined in the Applicant's Written Summary of Oral Submissions at ISH1 [REP1-098], the Applicant considers the interactions with the Grimsby to Walpole project can be appropriately managed through the design flexibility included within the Scheme. Further detail, in response to technical concerns raised by NGET in respect of these interactions are also provided in the Applicant's Response to Written Representations (Doc Ref. [8.32). LCC similarly raised the recommendation of a requirement to restrict commencement of the development until a connection is finalised at ISH1. As set out in Applicant's Written Summary of Oral Submissions at ISH1 [REP1-098] at pg 17, where previous DCOs have relied on as yet consented or constructed grid connections, the Secretary of State has been clear such requirements are unnecessary, given any

Reference	Topic	Matter Raised	Applicant's Response
			development would not be commercially feasible without final certainty as to connection. Accordingly, no amendment to the draft DCO is proposed in this respect.
2.3	BESS	The original 2022 grid connection offer received by the Applicant was for a 750MW export and a 350MW import BESS capacity that would be charged by 2 hours of peak production. Following the change to Gate 1 status after the NESO reforms, it is assumed that in applying for a Gate 2 connection this requested export/import capacity would remain the same – confirmation from the Applicant on this point would be welcomed.	The Applicant confirms that it continues to pursue a Gate 2 connection on the same export and import capacity as the original grid connection offer, being 750MW export and 350MW import BESS capacity.
2.4		'Planning Act 2008: Guidance on associated development applications or major infrastructure projects' (April 2013) states that <i>“Associated development should be proportionate to the nature and scale of the principal development”</i> and <i>“The definition of associated development requires a direct relationship between associated development and the principal development. Associated development should therefore either support the construction or operation of the principal development, or help</i>	The Applicant notes LCC's comments.

Reference	Topic	Matter Raised	Applicant's Response
		<i>address its impacts... ii. Associated development should not be an aim in itself but should be subordinate to the principal development."</i> . In this instance, the Council is satisfied that the BESS and associated infrastructure can be categorised as 'associated development'.	

3.3. Landscape and Visual

Table 3-3: Landscape and Visual

Reference	Topic	Matter Raised	Applicant's Response
3.1	Introduction	The Council commissioned AAH Landscape Consultants to assist in the consideration and review of the landscape and visual elements of the Meridian proposal and have engaged and provided feedback and advice to the Applicant's design team on behalf of the Council throughout the pre-application stage. A full copy of the report prepared by AAH is attached as an Appendix i which has reviewed the DCO application documentation, and the following summary and conclusions is based on those comments and should be read in conjunction with the full document.	The Applicant's detailed responses to comments raised by AAH Landscape Consultants are provided within Table 3-17 of this document.

Reference	Topic	Matter Raised	Applicant's Response
3.2		The Landscape and Visual Impact Assessment (LVIA) submitted as part of the DCO application is considered comprehensive, well-presented and generally undertaken in accordance with current best practice, notably Guidelines for Landscape and Visual Assessment (GLVIA)3 and LI TGN-2024-01. The LVIA is proportionate to the scale of the development and has been prepared by competent experts. It identifies potential effects arising from construction, operation (Years 1 and 15) and decommissioning phases.	The Applicant notes LCC's agreement of the general approach and methodology for the LVIA.
3.3	Mitigation	The reliance on planted mitigation in a predominantly open landscape may introduce its own adverse effects, including changes to the perceived openness and rural qualities, and potential enclosure where currently absent. Consequently, the Applicant has adopted a 'no mitigation approach' for some areas of the project. AAH would suggest that more mitigation can be integrated into this landscape where it relates to settlements, rivers, watercourses, existing scattered woodland blocks and existing field boundary vegetation.	The Applicant notes LCC's comments. The reference to a 'no mitigation approach' should be understood principally in relation to the overhead line (OHL) elements of the Scheme and does not mean that landscape and visual mitigation has not been incorporated into the Scheme more generally. Landscape and visual mitigation has been developed iteratively through the design process, including the siting and layout of infrastructure and the incorporation of landscape planting, where this can provide appropriate screening and landscape integration within the Order Limits. The Applicant agrees that planting can be appropriate, where it responds to and reinforces existing landscape features, including settlement edges, watercourses, existing woodland blocks and field

Reference	Topic	Matter Raised	Applicant's Response
			boundary vegetation, and these principles have informed the landscape strategy within the Outline Landscape and Ecology Management Plan (OLEMP) [REP1-070]. However, the landscape and visual effects of the OHL infrastructure are, to a significant degree, inherent in its height, scale and function. Planting cannot readily screen the towers and overhead lines, and vegetation of sufficient scale to substantially screen this infrastructure would itself introduce considerable landscape change. Extensive or continuous screening belts or woodland planting could create uncharacteristic patterns of enclosure within the open, low-lying Fenland landscape and result in additional adverse landscape and visual effects. The mitigation strategy therefore seeks to provide targeted planting and landscape integration, where appropriate, particularly where this can reinforce existing landscape patterns, rather than introducing planting solely to screen infrastructure that cannot realistically be screened. The absence of additional mitigation in relation to some OHL elements, therefore, reflects the inherent limitations of mitigating infrastructure of this scale and a deliberate landscape-led approach, rather than an absence of mitigation across the Scheme.

Reference	Topic	Matter Raised	Applicant's Response
3.4	Methodology and assessment	Provide clearer explanation where professional judgement results in significance conclusions that differ from the indicative sensitivity and magnitude framework.	The sensitivity and magnitude framework provides an indicative basis for determining significance, but the final conclusions have been informed by professional judgement in accordance with the principles of Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) ² . In particular, consideration has been given to the distinctive characteristics of the Fenland landscape, including its flat, open character, extensive vistas and level horizons, which can increase the prominence and extent of views of the Scheme, despite the localised nature of some physical changes. The assessment has therefore considered the nature, extent and prominence of the change, the susceptibility and value of receptors, duration and reversibility, and the effectiveness of mitigation, rather than applying the indicative matrix mechanically. This explains where the professional judgement conclusion differs from the indicative sensitivity and magnitude outcome, including where significant effects remain, despite the reduction in magnitude resulting from maturing mitigation planting at Year 15. Where professional judgement has been

² Landscape Institute. Institute of Environmental Management & Assessment. 2013. Guidelines for Landscape and Visual Impact Assessment. Third Edition. Available as hard copy only.

Reference	Topic	Matter Raised	Applicant's Response
			applied, this has been specifically referenced within ES Appendix 12-4: Landscape Assessment [APP-238] and ES Appendix 12-6: Visual Assessment [APP-240].
3.5		Clarify how replacement of panels, batteries and other infrastructure during the 40 year operational life has been considered within the assessment.	As set out in ES Chapter 12: Landscape and Visual [APP-063], the operational phase assessment recognises that operational activities would include vegetation management, equipment servicing, maintenance, replacement and periodic inspection/monitoring. Individual replacement activities have not been separately assessed, as their location, timing and extent over the 40-year operational period cannot reasonably be predicted. Such activities would be temporary, intermittent and localised and would take place within the context of the operational Scheme. They would not result in a permanent change to the established form, scale or overall appearance of the Scheme. Periodic replacement and maintenance activities are therefore encompassed within the operational phase and are not anticipated to materially alter the landscape and visual effects reported for the operational Scheme.
3.6	Landscape baseline and assessment	Clarify the extent of vegetation removal, retention and reinstatement, secure these measures through the Landscape and Ecological Management Plan (LEMP) and DCO	Information regarding the extent of habitat changes is provided in Biodiversity Net Gain Report [REP1-059]. Furthermore, tree and hedgerow removals have been mapped and assessed within ES Appendix 12-8:

Reference	Topic	Matter Raised	Applicant's Response
		requirements, and expand the assessment to include openness, seasonality and agricultural land use as landscape receptors.	Arboricultural Impact Assessment [APP-242 to APP-243]. Vegetation removal has been shown indicatively within these reports; the final location of vegetation removals may change with detailed design, however, the extent of removal will be consistent with that assessed within Biodiversity Net Gain Report [REP1-059] and ES Appendix 12-8: Arboricultural Impact Assessment [APP-242 to APP-243]. ES Chapter 12: Landscape and Visual [APP-063] recognises this design flexibility and assesses the Scheme within the defined worst-case parameters, including locations where vegetation may require removal. The principles and measures for vegetation protection, removal, retention, reinstatement, establishment of new planting and management are secured through the OLEMP [REP1-070]. Requirement 7 of the Draft DCO [REP1-006] requires for a final LEMP to be substantially in accordance with the OLEMP [REP1-070]. Furthermore, Requirement 8 of the Draft DCO [REP1-006] commits the Scheme to delivering 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, as substantially in accordance with the methodology outlined in the OLEMP [REP1-070]. This approach provides appropriate flexibility to

Reference	Topic	Matter Raised	Applicant's Response
			accommodate the detailed design whilst ensuring that the relevant landscape and ecological mitigation measures are implemented and maintained. The Applicant does not consider it necessary to expand the LVIA to assess openness, seasonality and agricultural land use as separate landscape receptors. These matters are already considered as characteristics, components and perceptual qualities of the landscape character receptors assessed in ES Chapter 12: Landscape and Visual [APP-063]. Openness and agricultural land use form part of the assessment of existing landscape character and the effects arising from the introduction of the Scheme and associated land-use change. Seasonal variation is also explicitly addressed, with construction, Year 1 and decommissioning assessed in winter conditions and Year 15 assessed in summer with established mitigation planting. The Applicant therefore considers these matters to have been appropriately incorporated within the landscape and visual assessment.
3.7		Review the future baseline to better reflect the scale of renewable energy development anticipated across the wider landscape.	The future baseline in ES Chapter 12: Landscape and Visual [APP-063] provides a concise description of the likely evolution of landscape character and visual amenity in the absence of the Scheme, including anticipated increases in built development.

Reference	Topic	Matter Raised	Applicant's Response
			The wider programme of committed and reasonably foreseeable renewable energy and associated infrastructure is considered in ES Appendix 12-7: Landscape and Visual Cumulative Assessment [APP-241], which assesses the resulting cumulative landscape and visual effects. The future baseline and cumulative assessment should therefore be read together. While the future baseline does not individually identify these energy developments, they have not been excluded from the ES and their influence on the evolving landscape and visual context has been considered through the cumulative assessment.
3.8	Visual assessment	Complete the visual assessment by providing Type 3 photomontages/Accurate Visual Representations (AVRs), including the solar arrays, substations, BESS compounds and overhead line infrastructure.	The Applicant does not consider that additional Type 3 photomontages are required to complete the visual assessment. The selection of representative viewpoints and the proportionate balance between Type 1 annotated photographs and Type 3 photomontages were subject to ongoing consultation with LCC and SHDC and were understood by the Applicant to have been agreed prior to the submission of the ES. Additional viewpoints requested through this consultation, and whether they were produced as Type 1 or Type 3, were also discussed at a virtual meeting with LCC and SHDC on 18 September 2025. The agreed recommendations were incorporated into the assessment.

Reference	Topic	Matter Raised	Applicant's Response
			The submitted visualisations, together with the ZTVs, viewpoint photography and visual assessment, provide an appropriate basis for assessing the Scheme. All elements of the Scheme, including solar panels, BESS, substations and overhead line infrastructure, have been considered within the assessment based on the parameters set out in ES Chapter 2: The Scheme [AS-017]. The Applicant therefore considers the visual assessment to be complete and proportionate and does not consider that further Type 3 photomontages are necessary.
3.9		Review the assessment of substations and other major infrastructure, provide further justification where effects remain unchanged throughout the project life, and explain the conclusion that a Residential Visual Amenity Assessment is not required.	The assessment distinguishes between Operational Year 1, when proposed planting would be immature, and Operational Year 15, when mitigation planting is assumed to be fully established. Where effects reduce by Year 15, this is reflected in the assessment. However, for some receptors the significance of effect remains unchanged because, notwithstanding the increased screening provided by established planting, the scale and/or height of the relevant infrastructure means that it would remain a noticeable component of the view and the resulting magnitude of change does not reduce sufficiently to alter the significance category. An unchanged significance rating therefore does not indicate that the effect of mitigation has not been

Reference	Topic	Matter Raised	Applicant's Response
			considered; rather, it reflects that the residual change associated with elements of the Scheme remains within the same significance category at Year 15. The Applicant considers that the assessment appropriately reflects the effectiveness and limitations of landscape mitigation in relation to the different components of the Scheme. See Table 2-3 of Relevant Representations Report [REP1-074] response in relation to matters concerning the Residential Visual Amenity Assessment (RVAA).
3.10		Strengthen the assessment of Public Rights of Way, National Cycle Routes, bridleways and other recreational routes, including additional viewpoints where appropriate, particularly along South Holland Main Drain.	Public Rights of Way, National Cycle Routes, bridleways and other recreational routes have been considered as visual receptors within the LVIA. Representative viewpoints were selected to assess views experienced by these receptors and were developed through consultation with LCC and SHDC. Additional viewpoints requested by LCC were incorporated, and the final viewpoint selection was understood by the Applicant to have been agreed with both authorities prior to completion of the assessment. The assessment therefore considers the potential effects on recreational receptors, including those using routes within and surrounding the Scheme. The Applicant considers that the agreed representative viewpoints provide an appropriate and proportionate

Reference	Topic	Matter Raised	Applicant's Response
			basis for assessing these effects, including in the vicinity of the South Holland Main Drain (refer to Viewpoints LCC5 and LCC6 (ES Figure 12-22 [APP-144] and [APP-145])) which were included following a direct request from LCC during stakeholder consultations), and does not consider that additional viewpoints are required.
3.11	Design and mitigation	Review the layout and setbacks at South Holland Main Drain/Langary Gate Road (Field D) and Martins Road (Fields A and B), and consider targeted mitigation where compatible with landscape character.	The Scheme layout and mitigation strategy have already considered sensitive receptors in the vicinity of South Holland Main Drain, Langary Gate Road and Martins Road. At Langary Gate Road, PV panels are set back a minimum of 50 m from residential properties, with Habitat Management Areas and targeted advanced planting comprising bands of shrubs, or bands of shrubs and scattered trees incorporated along the entire length of South Holland Main Drain. On Martin's Road, PV panels are also set by a minimum of 50m from the residential property situated on it. Furthermore, targeted advanced planting and bands of shrubs and trees is also proposed along the eastern side of Martins Road. Sections of the planting at both Martins Road and Langary Gate Road is identified for implementation in advance of construction, where practicable, to maximise establishment prior to operation. The planting strategy has been designed to

Reference	Topic	Matter Raised	Applicant's Response
			provide targeted screening while responding to the existing landscape character and vegetation pattern. The Applicant therefore considers that appropriate setbacks and targeted landscape mitigation have already been incorporated into the Scheme at these locations. This mitigation is set out and secured through the OLEMP [REP1-070].
3.12		Strengthen the Outline LEMP through long-term management, monitoring and replacement planting commitments.	The OLEMP [REP1-070] already includes strong and clear commitments for the long-term management and monitoring of landscape mitigation. 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. The OLEMP [REP1-070] 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. 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 LCC, which is, for this particular matter, detailed in ES Chapter 12: Landscape and Visual [APP-063], Table

Reference	Topic	Matter Raised	Applicant's Response
			12-2. In addition to this commitment, the following commitments have been listed in paragraph 5.4.7 of the OLEMP [REP1-070]: • Cutting will be carried out at the end of the winter in February, aiming to retain berries through the winter months for wildlife and avoiding the bird breeding season; • Overgrowing or overhanging branches will be removed from any pathways, private tracks, or adjacent public roads to keep them unobstructed; • 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 • 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. 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

Reference	Topic	Matter Raised	Applicant's Response
			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.
3.13	Cumulative assessment	Keep the future baseline and cumulative assessment under review throughout the Examination to reflect emerging renewable energy and grid infrastructure proposals.	The ES presents the assessment based on the baseline and cumulative development information available at the time of its preparation. The cumulative assessment in ES Appendix 12-7: Landscape and Visual Cumulative Assessment [APP-241] considers the relevant committed and reasonably foreseeable renewable energy and grid infrastructure proposals identified at that time. Throughout the Examination, the Applicant will continue to review emerging renewable energy and electricity network infrastructure proposals where they become relevant to matters under examination. Where a material change arises that has the potential to affect the robustness of the ES conclusions, the Applicant will provide updated information to the Examining Authority where appropriate. The Applicant will continue to engage with the relevant planning authorities, statutory consultees and other promoters throughout the Examination, including through Statements of Common Ground where relevant, to ensure that the cumulative assessment

Reference	Topic	Matter Raised	Applicant's Response
			remains appropriate for the purposes of the Examination.
3.14	Figures and supporting information	Provide clearer explanation of key assessment judgements within the main LVIA, reducing reliance on supporting appendices.	ES Chapter 12: Landscape and Visual [APP-063] provides a proportionate summary of the assessment methodology, baseline conditions, key assessment findings and conclusions, with the supporting appendices (ES Appendices 12-1 [APP-235] to 12-7 [APP-241]) providing the detailed baseline information, receptor-specific assessments, supporting analysis and rationale underpinning those conclusions. This approach avoids unnecessary duplication of extensive technical information within the main chapter, while retaining a clear and transparent audit trail and providing an appropriate balance between a reasonably succinct main chapter and the detailed technical information necessary to support the assessment.
3.15		Update Figure 12-3 to identify long-distance recreational routes and improve cumulative mapping by naming schemes rather than application numbers.	An updated ES Figure 12-3 Public Rights of Way and National Cycle Network (Doc Ref. 6.2 Rev 1), naming the MacMillan Way long distance recreational route has been provided at Deadline 2. ES Figure 4-1 Short List of Cumulative Schemes [APP-086] shows all cumulative schemes within 30km and should be read in conjunction with ES Appendix 4-1: List of Cumulative Schemes [APP-170]. This approach provides a consistent and unambiguous means of

Reference	Topic	Matter Raised	Applicant's Response
			identifying each cumulative scheme and enables the schemes shown on the figures to be readily cross-referenced. The use of application reference numbers also avoids potential ambiguity arising from project names, which may change during the planning and consenting process or may be used differently by different project promoters and stakeholders. Additionally, the application numbers are also clearly referenced in ES Appendix 12-7: Landscape and Visual Cumulative Assessment [APP-241]. However, NSIP schemes within 5km do have both their name and application number shown on ES Figure 4-2 Short List of Cumulative Schemes within 5km radius [APP-087].
3.16	Summary	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 landscape character and the visual setting, specifically along the grid connection route, and acknowledges the limitations of mitigation to reduce these effects due to the nature of the existing open landscape. The project has generally been designed with sensitivity to reduce effects on receptors with	The Applicant welcomes LCC's acknowledgement of the robustness of the LVIA.

Reference	Topic	Matter Raised	Applicant's Response
		setbacks and mitigation planting used sparingly to remain in keeping with the existing landscape.	
3.17		However, there are a few locations and receptors that are of concern and although it is acknowledged the landscape is open and generally sparsely vegetated, LCC are concerned that this shouldn't mean a minimal approach to mitigation in all cases. Specifically, there may be scope to use localised vegetation for mitigation if it is targeted at sensitive views (e.g. VP3) or used where dwellings already have established vegetation (e.g. at Whaplode Drove). The importance of some PROW including those on South Holland Main Drain seems to have been overlooked. We would suggest that figure 12-3 Public Rights of Way and National Cycle Route is keyed to highlight longer distance routes like the MacMillian Way. The solar array design (field D) at the junction of South Holland Drain and Langary Gate Road does not have set backs, so the solar arrays will be on both sides of the PROW in this location.	The landscape mitigation strategy set out within the OLEMP [REP1-070] does not adopt a minimal approach to planting. Mitigation responds to the particular landscape and visual context, balancing targeted screening with the characteristic openness and long-distance views of the Fenland landscape. The LVIA also identifies areas with more established vegetation, including around Whaplode Drove, where remnant hedgerows, tree planting and distinctive lines of poplars occur. At Viewpoint 3, targeted mitigation is already proposed along the western side of Land Parcel A, comprising of bands of shrubs and bands of shrubs with scattered trees. This will increasingly filter views of the solar development as planting establishes. However, full screening has deliberately not been sought, as this would remove the characteristic openness and long-distance views eastwards and itself materially alter the existing visual character. Public Rights of Way and recreational routes have also been considered within the LVIA. The assessment specifically identifies bridleways along the South Holland Main Drain as High-sensitivity recreational

Reference	Topic	Matter Raised	Applicant's Response
			receptors, together with other recreational routes including the Macmillan Way. These routes are listed in ES Chapter 12 Landscape and Visual [APP-063] and are shown on ES Figure 12-3: Public Rights of Way and National Cycle Network (Doc Ref. 6.2 Rev 1) . The specific identification of the Macmillan Way in ES Figure 12-3 Public Rights of Way and National Cycle Network (Doc Ref. 6.2 Rev 1), which follows the routes of existing PRowWs, has been provided within an updated version of the figure at Deadline 2. In relation to Land Parcel D and Langary Gate Road, the Scheme already incorporates targeted mitigation along South Holland Main Drain. The OLEMP [REP1-070] identifies a minimum 50 m offset of PV panels from residences along Langary Gate Road, together with Habitat Management Areas and Advanced Planting in selected locations, including bands of shrubs and bands of shrubs with scattered trees along sections of Langary Gate Road. This planting is specifically intended to retain visual amenity and reduce visual effects (refer to OLEMP, Annex A Figure 1 Outline Landscape Masterplans [REP1-070]). The Applicant therefore considers that the Scheme already incorporates a landscape-led and targeted approach to mitigation, including at sensitive receptors and recreational routes, while recognising that

Reference	Topic	Matter Raised	Applicant's Response
			extensive additional planting would not necessarily be appropriate within the characteristically open Fenland landscape.
3.18		With regards to landscape character, the impact of the solar arrays seems to be understated by the assessment with impact of the development on 'openness' and 'agricultural land use' not considered with sufficient emphasis. The assessment focuses on landscape character areas which is appropriate, but landscape receptors can include 'constituent elements of the landscape' and 'specific perceptual qualities' P36 – GVLA3.	The assessment has considered the effects of the Solar Development Areas on landscape character and the constituent characteristics and perceptual qualities that contribute to that character, including agricultural land use and openness. The Landscape Baseline reported within ES Appendix 12-3 [APP-237] and summarised within ES Chapter 12: Landscape and Visual [APP-063] identifies the Site as a predominantly flat, open agricultural landscape characterised by large-scale arable fields, sparse vegetation and long, open views.
3.19		With regards to visual amenity, the visual assessment seems to be understating the impact of the substations (possibly because their design is not finalised) and more explanation of their visual impact will be required as their design development progresses. There are also many dwellings in proximity to the development that will require localised mitigation to reduce visual impacts upon them. AAH look forward to reviewing planting designs, visualisations and more detailed proposals when this information becomes available.	The change from agricultural land to solar development and associated infrastructure, together with the resulting reduction in perceived openness, has informed the assessment. These changes are expressly identified in the assessment of significant effects on The Fens Historic Landscape Character Area (HLCA) and Eastern Fens Historic Landscape Character Zone (HLCZ), including land-use change, alteration of rural character and a perception of reduced openness. The Year 15 assessment also considers how established mitigation planting affects openness, recognising increased enclosure around the Solar Development

Reference	Topic	Matter Raised	Applicant's Response
			Areas while retaining gaps in planting and long-distance views. The Applicant therefore considers that agricultural land use, openness and the relevant constituent characteristics and perceptual qualities of the landscape have been appropriately considered within the assessment on the basis of the maximum parameters defined for the Scheme. Similar principles have been considered and reflected within the visual assessment. As such the Applicant does not consider that the assessment understates the effects of the Scheme. The substations and BESS have been assessed using the maximum parameters defined in ES Chapter 2 The Scheme [AS-017], supported by dedicated ZTV analysis and representative viewpoints. Where detailed design information was not available, including for the proposed substations, the visualisations represent the assessed maximum parameters and massing rather than detailed architectural appearance. This is consistent with the parameter-based approach to the DCO Application. Section 4.2 of the OLEMP [REP1-070] secures landscape design principles where specific localised mitigation is proposed for residential properties, for example with regards to landscape buffers and

Reference	Topic	Matter Raised	Applicant's Response
			advanced planting. Annex A of the OLEMP [REP1-070] also provides illustrative landscape masterplans.
3.20		Therefore, the Council concludes that the proposed development would have negative landscape and visual impacts.	The Applicant notes LCC's conclusion. The LVIA acknowledges that the Scheme would result in adverse landscape and visual effects, including significant adverse effects on identified landscape and visual receptors throughout its lifetime. The assessment also considers how these effects change over time as mitigation planting establishes, while recognising that some significant residual effects would remain at Year 15. LCC's conclusion is therefore broadly consistent with the findings of the LVIA, subject to the detailed receptor-specific significance judgements reported within the assessment. Whilst the LVIA identifies significant landscape and visual effects, the Applicant considers that these effects 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].

3.4. Ecology and Biodiversity

Table 3-4: Ecology and Biodiversity

Reference	Topic	Matter Raised	Applicant's Response
4.1	Introduction	The Council has reviewed the submitted information concerning the assessment of potential ecological effects of the proposed development. APP-060 (6.1 ES Chapter 9: Ecology and Biodiversity) and associated appendices set out the biodiversity and ecological elements of the Applicant's ES. Subject to specific comments below, the Council considers that information included in (APP-060) and its appendices provides a reasonable summary of ecological interest features and likely significant effects, mitigation, and residual effects of the proposed development.	The Applicant notes LCC's comments and has provided specific responses to the comments raised in rows below.
4.2	Habitats Regulations	The Council has no reason to disagree with the conclusions of the Habitats Regulations Assessment Report (APP-217). However, the SoS will need to undertake a HRA and be satisfied that sufficient information has been submitted by the Applicant in relation to potential impacts and proposed mitigation measures, in order to determine that there will be no adverse effect on the conservation status of these species or the sites with which they are associated.	The Applicant notes and acknowledges LCC's position.

Reference	Topic	Matter Raised	Applicant's Response
4.3	Existing Biodiversity Value	The Council is of the opinion that additional information / clarification is required to accurately determine the site's existing baseline value. Botanical surveys and scarce arable flora: The Council notes that a full botanical survey has not been undertaken (APP-205, 2.5.1). The Council also notes that certain habitats (arable field margins, neutral grassland and modified grassland) have been scoped out of further assessment on the basis of being species poor or of variable condition (APP-060, 9.6.16 – 9.6.18). The Council questions the scoping out of habitats on this basis if detailed botanical surveys have not been undertaken. The Council considers that clarification is required, particularly in relation to the need for surveys for scarce arable flora.	Whilst a full botanical survey was not undertaken, UKHab habitat survey was completed across various months between August 2023 to August 2024, and early 2026, as reported within ES Appendix 9-2: Preliminary Ecological Appraisal [APP-205]. UKHab habitat surveys are used to identify where detailed botanical surveys are required. The habitats present during the surveys were species poor or of variable condition given the actively farmed arable fields, as such the need for a detailed botanical survey was not identified. Information from these surveys was also collected to inform the Biodiversity Net Gain (BNG) assessment and reporting and as such, the data collected is considered sufficient to inform the assessments undertaken.
4.4		Overall, the Council agrees with the Applicant's approach and considers that the proposed impact avoidance and mitigation measures for construction, operational and decommissioning phases of the development are appropriate and will need to be appropriately secured in the DCO.	The Applicant notes and acknowledges LCC's position. Environmental Mitigation and Commitments Register [REP1-057] summarises the mitigation relied upon and the corresponding securing mechanisms.

Reference	Topic	Matter Raised	Applicant's Response
4.5	Protected and Priority Species	A suite of both desk-based studies and field surveys has been undertaken to identify protected and priority species likely to occur within the DCO site boundary. These are described in (APP-060) and associated appendices. The Council has reviewed the application in accordance with Natural England's standing advice for protected species. Having considered (APP-060) the Council is of the opinion that additional information / clarification is required to accurately determine the presence / absence of protected and priority species and the likely effects of the proposed development.	A full suite of protected species surveys has been undertaken to confirm the baseline conditions and presence of protected species presence across the Site, as reported within ES Appendices 9-3 [APP-206] to 9-13 [APP-216] and summarised within ES Chapter 9: Ecology and Biodiversity [REP1-018] . Full details are provided below against the applicable species, where concerns have been raised however, the survey effort and design were completed in discussion/agreement with Natural England and is sufficient to inform the assessment.
4.6	Protected and Priority Species – Breeding Birds	Surveys described in APP-206 show that the proposed development has the potential to result in negative effects on the populations of a number of breeding bird species including five Schedule 1 species. These surveys were undertaken between March and July 2023 meaning that data from these surveys is now three years old. However, given that there has been limited change in the area and that the data was supplemented by further vantage point surveys for common crane in 2025 (APP-216), the data is considered to be generally adequate to identify potential impacts.	The Applicant notes and acknowledges LCC's position.

Reference	Topic	Matter Raised	Applicant's Response
4.7		The exception to the above general point relates to species such as barn owl and quail whose main breeding activity occurs around or after dusk and therefore may not be detected in normal breeding bird surveys undertaken in the early morning or during daylight hours. Given that both quail and barn owl are Schedule 1 species, the Council considers that additional surveys are required to identify potential impacts on barn owl and quail and to properly identify mitigation requirements. Barn owl was detected during winter bird surveys indicating that the species is present in the area.	As noted in ES Chapter 9: Ecology and Biodiversity [REP1-018], Table 9.2, in response to statutory consultation responses, the following statement is included: <i>'Nocturnal bird surveys (e.g. for owl, quail or snipe) are not routinely required under current guidance and are only considered necessary where habitats within a site are suitable and where there is a realistic potential for significant adverse effects. The habitats within the Order Limits are not considered optimal for nocturnal or nocturnally displaying species, with limited availability of key features such as extensive rough grassland, marshy habitats or mature woodland edge typically associated with these species. As such, it is considered unlikely that there would be a significant adverse effect. As such, it is considered that nocturnal bird surveys would be disproportionate. The approach was subsequently discussed and agreed with Natural England.'</i>
4.8		The proposed development will result in the loss of considerable areas of arable habitats which are of value to ground nesting species such as skylark. Without mitigation the development has the potential to have significant negative effects on populations of ground nesting farmland birds. This is particularly the case given the number of other developments within Lincolnshire that	The Applicant's full response to this matter is provided within the Relevant Representations Report [REP1-074] Table 5-6 in response to comments raised by Lincolnshire Wildlife Trust.

Reference	Topic	Matter Raised	Applicant's Response
		potentially have the same impacts. APP-060, 9.79 and APP282, 4.3.7 – 4.3.11 confirm that a Farmland Bird Mitigation Strategy will be developed which will include the retention of open areas and the establishment of 'skylark plots' to cater for the species' needs. The Council welcomes this approach but considers that additional information is required to confirm that the proposed mitigation is adequate to effectively mitigate impacts on ground nesting bird populations.	
4.9		Subject to the above comments in relation to nocturnal bird surveys and measures relating avoiding vegetation clearance during the nesting season and undertaking pre-commencement ecological surveys set out in the oCEMP (APP-275), the Council agrees that the proposed mitigation measures are appropriate and should ensure that significantly negative effects on breeding birds are avoided.	The Applicant notes and acknowledges LCC's position.
4.10	Protected and Priority Species – Non-breeding Birds	Surveys described in APP-207, APP-208, APP-209 and APP-213 show that the proposed development has the potential to result in negative effects on the populations of a number of wintering bird species including species associated with the Nene Washes (SPA/Ramsar)	The Applicant notes and acknowledges LCC's position.

Reference	Topic	Matter Raised	Applicant's Response
		and The Wash (SPA/Ramsar). Surveys were undertaken over multiple years and included nocturnal vantage point surveys. Data from the surveys were also used to inform a collision risk modelling exercise in relation to the proposed length of overhead power lines (APP-218).	
4.11		The Council considers that the data from the surveys is adequate to determine the likely impacts of the proposal on non-breeding birds. Mitigation measures set out in the oCEMP (APP-275) and oOEMP (APP-276) include the installation of line markers and avoidance of night-time working and are considered appropriate to mitigate the potential impacts.	The Applicant notes and acknowledges LCC's position.
4.12	Protected and Priority Species – Bats	Surveys described in APP-214 have identified the presence of an assemblage of bats which is of national importance. This includes the nationally rare barbastelle. The Council notes the Applicant's intention to avoid impacts to known roosts and to undertake additional pre-construction surveys to update data on bats. The Applicant also makes commitments in the oCEMP (APP-275) to conforming to best practice guidelines in relation to lighting to reduce impacts on bats.	The Applicant notes and acknowledges LCC's position.

Reference	Topic	Matter Raised	Applicant's Response
4.13		A recent study (Tinsley et al., 2023) has shown a decrease in levels of bat activity associated with the presence of solar developments, though reasons for this are not yet clearly understood. The Council recommends that monitoring of post-construction bat activity is undertaken to compare activity levels prior to construction and to assess mitigation efficacy in order to increase understanding of the impacts of solar developments on local bat populations.	The study from Tinsley et al, 2023 ³ is acknowledged. Research on the effects of solar developments on wildlife is still limited with some studies showing a decline in biodiversity whilst others show an increase in biodiversity ⁴ . The findings of a single study should not be relied upon in isolation. The Applicant does not consider that post-construction monitoring would be needed for the Scheme specifically, as no likely significant effects on bats have been identified. The Applicant however does note that the Community Benefit Fund could provide a mechanism for further research opportunities to be explored.
4.14	Protected and Priority Species – Badgers	APP-211 confirms that badgers are present within the draft DCO boundary. The Council considers proposed mitigation measures including undertaking pre commencement surveys and the establishment of 30m buffer zones around setts during construction are appropriate and are adequately secured in the oCEMP (APP 275).	The Applicant notes and acknowledges LCC's position, though it is requested that any/all information on badger presence is treated as confidential and not disclosed in the public domain due to the risk of persecution.

³ Tinsley, E., Froidevaux, J., Zesbok S., Szabadi K., Jones G., (2023) Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity

⁴ Wilder Ecology, Suffolk Wildlife Trust (2025), Literature Review Impacts of ground mounted solar farm/parks on biodiversity

Reference	Topic	Matter Raised	Applicant's Response
4.15	Protected and Priority Species – Riparian Mammals	APP-210 sets out the results of riparian mammal surveys. Populations of both otter and water vole have been detected within the draft DCO boundary. Due to access difficulties, some ditches could not be surveyed. These will need to be surveyed during planned pre-construction surveys secured in the oCEMP (APP-275) to inform detailed mitigation and licencing requirements.	The Applicant notes and acknowledges LCC's position. A pre-commencement survey is committed to and secured within the oCEMP [REP1-061]. The presence of these protected species has been discussed and an appropriate licensing approach for water voles has been agreed with Natural England. Any adjustments to the agreed approach (if applicable) following updated survey will be discussed and agreed with Natural England.
4.16		The Council consider that proposed mitigation measures set out in Table 3-5 of the oCEMP (APP-275) are appropriate in relation to both species.	The Applicant notes and acknowledges LCC's position.
4.17		The Council advises that the Greater Lincolnshire Partnership's 'Operation Water Vole' project may offer opportunities to deliver additional water vole mitigation.	Opportunities to align with the Greater Lincolnshire Partnership's 'Operation Water Vole' will be explored at detailed design. Current mitigation has been discussed and agreed with Natural England and if needed, will be updated when formally submitting the UK Protected Species Licence application.
4.18		Where protected species will be affected by the proposed development, a licence from Natural England will be sought and mitigation will be secured as part of the licensing process. The Council agrees with this approach.	The Applicant notes and acknowledges LCC's position.

Reference	Topic	Matter Raised	Applicant's Response
4.19	Biodiversity Net Gain	The delivery of at least 10% BNG is not currently mandatory for NSIPs however it is considered best practice. Given the scale and nature of the proposed development the Council will expect the project to deliver significantly more than 10% BNG.	The Applicant notes and acknowledges LCC's position. Requirement 8 of the Draft DCO [REP1-006] secures the delivery of 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.
4.20		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. 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. The Council welcomes this level of BNG delivery.	The Applicant notes and acknowledges LCC's position.
4.21		The Council considers that the following areas of the Applicant's BNG assessment require additional information or clarification:	The Applicant's responses are provided in rows below.
4.22	Biodiversity Net Gain - Strategic significance	In advance of the adoption of the Greater Lincolnshire Local Nature Recovery Strategy (LNRS) the LNRS Steering Group has confirmed that the draft LNRS should be used to assign strategic significance. The Applicant should therefore review the assignment of strategic	The Applicant will consider the changes that would be required to the BNG assessment with the adoption of the Greater Lincolnshire Local Nature Recovery Strategy and will provide an update at Deadline 3 as part of the Statement of Common Ground with LCC.

Reference	Topic	Matter Raised	Applicant's Response
		significance in line with the draft LNRS and update the metric calculations where appropriate.	
4.23	Biodiversity Net Gain - Assumed habitat condition	at 2.6.7 of APP-274, the Applicant states that some areas of baseline habitat could not be surveyed in detail due to access difficulties. The Applicant also states that in these instances, habitat condition has been applied conservatively based on the condition of surrounding parcels. The Applicant should clarify which parcels have not been surveyed. The Council considers that where condition has been assumed, the Applicant should adhere to the precautionary principle by assuming the highest possible condition where uncertainty exists.	In total, 20.93 ha of the total 509.56 ha of the Grid Connection Route could not be surveyed due to access constraints. The determination of habitats that could not be surveyed was based on a combination of site visits of adjacent areas, aerial imagery and comparison with similar habitat types that were subject to detailed survey. As such it was possible to make a reasonable judgement of habitat type and condition on a precautionary basis, however, without disproportionately assuming 'good' condition where this would not be appropriate. The assessment was further informed by the following data sources. • NGET Preliminary Ecological Appraisal (PEA) data and bird survey data for the Grimsby to Walpole DCO project⁵ have been used to supplement the assessment in addition to the walkover survey completed for the Scheme.

⁵ 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]

Reference	Topic	Matter Raised	Applicant's Response
			This data was received in GIS format from NGET and it informed the preparation of habitat mapping shown on ES Figure 9-3: UKHab - Part 1 Baseline [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. • As demonstrated by the walkover survey undertaken for the Scheme, this extended area is homogenous with the wider surrounds given its arable nature. • 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 schemes, so that all potential effects of the Scheme are considered. As such, the assessment

Reference	Topic	Matter Raised	Applicant's Response
			presented within ES Chapter 9: Ecology and Biodiversity [REP1-018] adopts a precautionary approach, where no disturbance to existing baseline is assumed. It is also noted that the OCEMP [REP1-061] commits to further pre-construction surveys, with any resultant actions and mitigation to be incorporated within the detailed CEMP.
4.24		The Council also encourages the Applicant to work with other developers and stakeholders in the area to identify opportunities to deliver BNG strategically. The Council welcomes further engagement with the Applicant in relation to BNG.	The Applicant provided a response to this matter within the Relevant Representations Report [REP1-074], Table 2-2 and updated the OLEMP [REP1-070] at Deadline 1 to align with the Greater Lincolnshire LNRS. For further response, refer to the comments on 'Ecological Steering Group'.
4.25	Cumulative effects	The Applicant's assessment concludes that there will be no significant adverse effects on ecology arising from cumulative impacts, however, as stated above the Council considers that additional details of measures to be taken to avoid negative impacts on populations of ground nesting birds present within the draft DCO area are required.	The Applicant's full response to this matter is provided within the Relevant Representations Report [REP1-074] Table 5-6 in response to comments raised by Lincolnshire Wildlife Trust.
4.26		The Council suggests that consideration is given to the establishment of an Ecological Steering	The Applicant will consider the changes that would be required to the OLEMP [REP1-070] and will provide an

Reference	Topic	Matter Raised	Applicant's Response
	Ecological Steering Group	Group or similar for the proposed development. This group should consist of key ecological stakeholders (both statutory and non-statutory). The remit of the group would be to receive updates on project progress and to advise on issues encountered during construction as well as to refine delivery of required mitigation and enhancement measures. Meetings should be held at an appropriate frequency to ensure good communication between both the developer and stakeholders.	update at Deadline 3 as part of the Statement of Common Ground with LCC.
4.27		This approach is also likely to yield benefits by assisting with the identification of opportunities for strategic working with other solar NSIP developers in the vicinity. This is particularly the case in relation to the delivery of BNG where strategic delivery could result in significant benefits for species groups such as ground nesting birds.	
4.28		Establishing such a group is the Council's preferred approach to ensuring ongoing communication between the Applicant and host Local Authorities on matters relating to ecology and biodiversity post-consent. This approach is consistent with other recent NSIP proposals in the County (Outer Dowsing Offshore Wind,	

Reference	Topic	Matter Raised	Applicant's Response
		Springwell Solar Farm, One Earth Solar Farm and Beacon Fen Energy Park). The Council would be happy to provide the Applicant with a draft terms of reference for the Ecological Steering Group to be included in the oLEMP.	
4.29	Overall impacts of the development on ecology and biodiversity	The Applicant's ES identifies a series of potential impacts on ecology arising from the development. These range from minor adverse impacts to significant adverse impacts depending on the species, habitat or site concerned. Measures to address these impacts are proposed and should be secured in the DCO. If the mitigation measures are secured and delivered as proposed the Council considers that the development would have a minor, temporary, negative impact on ecology during the construction phase.	The Applicant notes and acknowledges LCC's position. Environmental Mitigation and Commitments Register [REP1-057] summarises the mitigation relied upon and the corresponding securing mechanisms.
4.30		The Applicant has also stated their intention to deliver BNG. Levels currently being predicted are subject to confirmation of final scheme designs, however, if these levels are delivered, the Council considers that, the development could have a positive impact on ecology and biodiversity. Commitments to deliver a minimum	The Applicant notes and acknowledges LCC's position. Requirement 8 of the Draft DCO [REP1-006] secures the delivery of 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.

Reference	Topic	Matter Raised	Applicant's Response
		of 10% BNG should be secured with a specific requirement in the DCO if BNG is to be given positive weight in the planning balance. The Council notes the wording of Requirement 8 in the draft DCO (APP-028) and considers that this is appropriate to secure the delivery of BNG.	

3.5. Traffic and Transport

Table 3-5: Traffic and Transport

Reference	Matter Raised	Applicant's Response
5.1	The Council in its capacity as Local Highway Authority has reviewed the application documents and has been involved in discussions with the Applicant pre-submission of the DCO application. In general, the Council's position on highway matters remains as stated in our relevant representation [RR-111],	The Applicant notes and acknowledges LCC's position. The Applicant's responses to the matters raised in LCC's relevant representation are set out within Table 2-2 of the Relevant Representations Report [REP1-074].
5.2	The ES Chapter 15: Traffic and Access [APP-066] provides most of the highway assessment information, there is also a supporting transport assessment note in ES Appendix 15-4 [APP-251], but this only covers collision data. These documents do not cover the same scope as a standard transport assessment, there are no flow or turning calculations at the proposed key site access junctions and these need to be provided.	This matter has been responded to within Table 2-2 of the Relevant Representations Report [REP1-074].

Reference	Matter Raised	Applicant's Response
5.3	Notwithstanding the short comings identified above, the assessment set out in APP-066 is generally accepted, the trip rates for workers (table 15-13) appears 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 appropriate and the link flow impacts are shown in table 15-21.	The Applicant notes and acknowledges LCC's position. The comments raised have been responded to within Table 2-2 of the Relevant Representations Report [REP1-074].
5.4	LCC have the following key concerns at this stage:	These matters have been responded to within Table 2-2 of the Relevant Representations Report [REP1-074]. The Applicant has scheduled a meeting to discuss these matters further with the LCC Highways Officer for 5 October 2026 and will provide an update on the discussions as part of the Statement of Common Ground with LCC at Deadline 3.
5.5	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 would be straight over movements, and whether a staggered arrangement is being considered. When further information is provided and LCC can agree the junction form and type, a Stage 1 Road Safety Audit will be required at this planning stage.	
5.6	Access A16-01 - This access is proposed on the A16 near Cowbit. Further information on traffic turning flows at this junction is required. It will also require a ghost island right turn lane and a Stage 1 Road Safety Audit.	

Reference	Matter Raised	Applicant's Response
	Both the above junctions will need to be delivered through full Section 278 Agreements with LCC.	
5.7	Passing Places - The oCTMP [APP-278-9] (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 LCC 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 land ownership. Back Bank is also identified for HGV routing (figure 15-3 [APP 161]) and will therefore also require passing places.	
5.8	The CTMP should reference the need for future technical approvals. The Council would wish to see specific wording included in the oCTMP, along the lines of that included in the CTMP for the Tillbridge Solar DCO and the Springwell Solar DCO, as follows:	The Applicant notes the LCC's request to include specific wording related to future technical approvals in the oCTMP [APP-278]. The Applicant proposes to amend the suggested text to the following: <i>Prior to any construction works being undertaken that physically alters assets within the limits of highway adoption, the detailed design of these works must be submitted to the Lincolnshire County Council for approval.</i> These submissions would include: • A programme for the works, details of the construction method and traffic management requirements;
5.9	"5.4. Delivery of Road Modifications 5.4.1. Prior to any construction works being undertaken within the limits of highway adoption, the detailed design of these works must be submitted to the Lincolnshire County Council for approval. These submissions will include: • A programme for the works, details of the construction method and traffic management requirements;	

Reference	Matter Raised	Applicant's Response
	• A detailed design pack of drawings and specifications detailing the works and any service / utility works that may need to be accommodated; • The necessary health and safety information required under the Construction, (Design & Maintenance) Regulations, or their equivalent at the point of submission; Details of the proposed contractor, including their insurance provisions; • If required by the local road authorities, a Road Safety Audit (RSA) to a combined Stage 1 and Stage 2 standard; • Details of any necessary road signage and road markings; and • Details of any proposed remediation proposals should the works not be permanent.	• A detailed design pack of drawings and associated specifications; • The necessary health and safety information required under the Construction, (Design & Maintenance) Regulations, or their equivalent at the point of submission; • Details of the proposed contractor, including their insurance provisions; • If requested by the Local Highways Authority, a Road Safety Audit (RSA) to a combined Stage 1 and Stage 2 standard; • Details of any necessary road signage and road markings; and • Details of any proposed remediation proposals should the works not be permanent. The Applicant has scheduled a meeting to discuss these matters further with the LCC Highways Officer for 5 October 2026 and will provide an updated version of the oCTMP [APP-278] by Deadline 3.
5.10	5.4.2. The Applicant will reimburse the highway authorities for the technical approval process at the time the applications are made, in line with costs for similar Section 278 or Section 184 applications made under the Highways Act.	The Applicant agrees with LCC's comment and will update the oCTMP at Deadline 3 accordingly. The revised oCTMP will include drafting based on the approach adopted in the Tillbridge Solar Project oCTMP, confirming that the Applicant will pay the relevant local highway authority's costs associated with the technical approval process at the time approval is sought, with the exact costs to be agreed through the final CTMP and reflecting the authority's standard costs for the relevant works at that time. The final CTMP will also set out the process for

Reference	Matter Raised	Applicant's Response
		obtaining technical approvals and identify the relevant local highway authority departments to which detailed design drawings will be submitted.
5.11	<i>5.4.3. The finalised CTMP will detail the exact process for these technical approvals."</i>	The Applicant refers LCC to the response above.
5.12	It is noted that the draft DCO [APP-028] contains a specific Article (10) regarding the application of the Lincolnshire Scheme for Road Works and Street Works. The Council, in its capacity as Highway Authority, has some concerns regarding aspects of the wording of this article, which are set out in section 22 below on DCO matters.	This is noted. A response is provided in Table 3-6 below.
5.13	Regarding cumulative effects, LCC note that the Applicant's assessment expects the cumulative effect during the construction phase with other development on road safety at four junctions to result in moderate effects (significant), however the assessment primarily attributes this to the other development schemes and not the Meridian scheme itself for three of the junctions (L3, L34 and L35) (paragraph 15.11.24). The fourth junction (L25) initially assessed as having a medium magnitude has been downgraded to low on the basis of professional judgement the reasons for which are set out in paragraph 15.11.25. The Applicant is proposing to minimise	The Applicant notes and acknowledges LCC's comments.

Reference	Matter Raised	Applicant's Response
	cumulative effects through measures set out in the oCEMP and oCTMP.	
5.14	The Infrastructure EIA Regulations 2017 are clear that an ES must assess whether the project, together with other developments, would result in significant environmental effects that would not occur from the project alone. LCC has concerns about the Applicant's assertion that impacts at three junctions are not attributable to the Meridian scheme, as this appears dismissive. Nevertheless, LCC notes the mitigation measures outlined in the oCEMP and oCTMP.	The Applicant agrees that the Infrastructure Planning EIA Regulations 2017⁶ require the assessment of likely significant effects arising from the Scheme both individually and cumulatively with other relevant developments. Accordingly, ES Chapter 15: Traffic and Access [APP-066] includes a cumulative assessment which considers the potential effects of construction traffic associated with the Scheme in combination with traffic arising from other committed and reasonably foreseeable developments. The Applicant would clarify that the statement that impacts at certain junctions are "not attributable to the Meridian Scheme" was not intended to dismiss the significance of the cumulative effects identified. Rather, it reflects the findings of the assessment, which indicate that the forecast traffic generated by the Meridian Scheme alone would not result in significant traffic and transport effects at these locations. The moderate significant effects identified arise within the cumulative assessment scenario as a consequence of the combined influence of traffic associated with multiple developments on

⁶ UK Government (2017) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/572). London: The Stationery Office. Available at: <https://www.legislation.gov.uk/uksi/2017/572/contents>. Accessed: 29 September 2026.

Reference	Matter Raised	Applicant's Response
		the highway network, rather than as a direct result of the Meridian Scheme in isolation. The Applicant recognises that, notwithstanding the limited contribution made by the Scheme to these cumulative effects, it is appropriate to consider measures to minimise its contribution wherever reasonably practicable. Accordingly, the oCEMP [REP1-061] and oCTMP [APP-278] include a range of mitigation and management measures, including construction traffic routing strategies, delivery scheduling, HGV management measures, traffic monitoring and ongoing liaison with the relevant highway authority. These measures are intended to reduce the impact of construction traffic on the highway network and contribute to the effective management of cumulative traffic impacts. The Applicant therefore maintains that the conclusions of the ES are robust and compliant with the EIA Regulations. The identification of cumulative significant effects at certain junctions does not alter the conclusion that the Scheme itself would not result in significant traffic and transport effects; however, the Applicant acknowledges the importance of potential cumulative effects and will continue to implement appropriate mitigation and management measures through the oCEMP [REP1-061] and oCTMP [APP-278] to minimise the Scheme's contribution to such effects.

Reference	Matter Raised	Applicant's Response
5.15	Whilst it is acknowledged that the ES should identify the contribution of the scheme to the effect it should not be used to avoid assessing or addressing the cumulative effect itself. The fact that the road safety assessment for the scheme in isolation against the existing baseline at these junctions concludes a minor (not significant) effect, this does not in LCC's opinion justify the statement that the cumulative effect with the other identified developments would be primarily attributed the other schemes. Even a small contribution can be relevant, particularly if the receptor is already under pressure or there are existing environmental problems that can worsen an already significant situation and potentially push the effect over the significance threshold.	The Applicant agrees that the cumulative assessment should consider and address the overall cumulative effect, irrespective of the relative contribution made by individual developments. References within the ES to the Scheme's limited contribution were intended to provide context on the source of the cumulative impact, rather than to diminish the significance of the cumulative effect identified. The Applicant acknowledges that even a comparatively small contribution can be relevant where receptors are already under pressure. Accordingly, the cumulative assessment has considered the combined impacts of all relevant developments and identified those locations where significant cumulative effects may arise. It should also be noted that the cumulative assessment represents a precautionary worst-case scenario, assuming the peak traffic impacts of all assessed developments occur concurrently. Whilst this outcome cannot be ruled out, it is considered unlikely in practice due to differences in construction programmes and phasing. Nevertheless, appropriate mitigation and management measures are proposed to reduce potential impacts as far as reasonably practicable should such overlap occur. The Applicant's ability to mitigate cumulative effects where those effects result from a combine impact of multiple large-scale developments is limited, as the Applicant cannot control the construction activities of another developer. It is, however,

Reference	Matter Raised	Applicant's Response
		possible for the Local Highway Authority (LHA) to influence potential overlaps between construction activities of major developers, and therefore minimise cumulative effects, through the approvals processes secured through the draft DCO [REP1-006]. Nonetheless, the Applicant is committed to implementing construction traffic management measures, controls and monitoring, where reasonably practicable, as established through the oCTMP [APP-278]. The Applicant would welcome opportunities for co-ordination with other major schemes to minimise overlaps in construction traffic movements on shared sections of the highway network, as set out within Section 7.6 of the oCTMP [APP-278]. The Applicant will seek to minimise the Scheme's contribution to any identified cumulative traffic effects in order to demonstrate the Applicant's commitment to best practice standards during the construction phase.
5.16	ES Appendix 15.6 Cumulative Schemes Traffic Flows [APP-253] sets out the 24 hour Total Vehicle and HGV traffic flows associated with each screened-in cumulative schemes and the Meridian scheme. Using junction L35 as an example from these tables Meridian's contribution to the cumulative traffic flows is comparable to some of the other schemes. Meridian would account for approximately 21% of the predicted total vehicle 24-hour traffic flows and 14% of the predicted HGV 24-hour traffic flows. LCC therefore contend the Applicant's	The Applicant notes LCC's comment that insufficient acknowledgement has been given to the Scheme's contribution to cumulative traffic flows. However, it is important to recognise that the cumulative assessment is based on 24-hour traffic totals and represents a precautionary worst-case scenario in which the traffic impacts of all assessed developments are assumed to occur concurrently. As detailed in ES Chapter 15: Traffic and Access [APP-066], the Scheme's construction traffic would, where reasonably

Reference	Matter Raised	Applicant's Response
	assertion that the contribution to the cumulative effect would primarily be as a result of other developments is not justified. It is considered that this requires further examination to determine the materiality of the contribution of the Meridian scheme at these junctions to the cumulative effect.	practicable, be managed to avoid the local highway network peak periods, with Light Good Vehicle (LGV) movements occurring before and after the AM and PM network peaks respectively, and Heavy Good Vehicle (HGV) movements focused within the interpeak period. As a result, whilst the Scheme contributes to cumulative 24-hour flows, its influence during the most sensitive periods of network operation is expected to be lower than the 24-hour percentage contributions alone may suggest. To return to the example of L35 cited by LCC, the Applicant notes that the Scheme's contribution to cumulative HGV two-way traffic increases at L35 is approximately 17% of the total of all cumulative scheme traffic (slightly higher than the figure of 14% cited by LCC), which contributes to the receptor sensitivity/magnitude assessment moving from a Very Low to Low magnitude classification within the cumulative assessment. In terms of actual flow increases, this is equivalent to a daily increase of 144 HGVs compared to an increase of 696 HGV flows caused by the other assessed cumulative schemes. Given that these 144 flows would be spread out over the eight-hour period between 09:00 – 17:00, this increase corresponds to an increase of 18 additional HGVs per hour on the receptor (9 in each direction), or about one additional HGV every seven minutes in each direction. The Applicant maintains that this is a negligible increase in hourly HGV traffic for a major A-road and that the 'Low' magnitude of impact on this receptor in the

Reference	Matter Raised	Applicant's Response
		cumulative assessment should primarily be attributed to the other cumulative schemes. Notwithstanding this, the Applicant acknowledges its responsibility to minimise its contribution to cumulative effects, wherever reasonably practicable. Accordingly, measures secured through the oCTMP [APP-278] and oCEMP [REP1-061] include construction traffic routing controls, delivery scheduling, HGV management measures, workforce travel initiatives, traffic monitoring and ongoing liaison with the Highway Authority. The Applicant would also welcome opportunities to coordinate with other major developments, where practicable, to minimise overlaps in construction traffic movements on shared sections of the highway network. The Applicant therefore considers that the cumulative assessment appropriately identifies the Meridian Scheme's contribution to the overall cumulative effect, whilst demonstrating that the effect itself arises from the interaction of multiple large-scale developments and has been assessed on a robust and precautionary basis.
5.17	It is also noted that the magnitude for receptor L25 in the cumulative assessment was reduced from medium to low (table 15-41) based on professional judgement for the reasons set out under paragraph 15.11.25. The ExA on reaching a recommendation should be satisfied that this downgraded position is adequately justified as if it hadn't	The Applicant stands by the reasons set out in paragraph 15.11.25 of ES Chapter 15: Traffic and Access [APP-066]. Furthermore, the use of professional judgement is supported by

Reference	Matter Raised	Applicant's Response
	been downgraded it would have potentially resulted in a 'major' effect (very significant). It is also noted that the in the Meridian Solar traffic assessment summarised in section 15.8, the magnitude at this receptor was also downgraded from low to very low.	the IEMA Guidelines⁷ which states at paragraph 1.13 <i>"These updated and replacement Guidelines are intended to complement professional judgement and the experience of trained and competent assessors. As the environmental impact of traffic and movement will vary on a case-by-case basis, the experience and expertise of the assessor will remain of primary importance, along with adequate consultation."</i> It should also be noted that, in EIA terms, significance is binary, i.e. an effect is either significant or not significant, an effect cannot be "very significant".
5.18	Additionally it is noted, at paragraph 15.11.8 of APP-066 that traffic flow estimates for National Grid's WMEL scheme (ID13) were not available at the time of writing. The Ossian Wind farm application has now been withdrawn. In terms of WMEL APP-066 is contradictory, despite being identified as a scoped in scheme in table 15.35, paragraph 15.11.8 goes on to screen it out of further cumulative assessment and states: <i>"The scoping opinions for these cumulative schemes do, however, indicate that traffic flow impacts would be limited to receptors located on the A16 and A151. As set out in</i>	The Applicant notes LCC's comments regarding the Weston Marsh to East Leicestershire (WMEL) and Ossian Wind Farm schemes within the cumulative assessment. The Applicant does not consider there to be a contradiction between Table 15.35 and paragraph 15.11.8 of ES Chapter 15: Traffic and Access [APP-066]. WMEL was appropriately identified as a cumulative development requiring consideration within the cumulative assessment process. At the time the ES was prepared, detailed traffic forecasts, traffic assignments and construction traffic data for WMEL were not publicly available and therefore a

⁷ IEMA (now ISEP) (2023), Environmental Assessment of Traffic and Movement, Institute of Environmental Management and Assessment. Available at: [ISEP - New ISEP Guidance: Environmental Assessment of Traffic and Movement](#). [Accessed: 23 September 2026].

Reference	Matter Raised	Applicant's Response
	<i>Section 15.8, all effects associated with the Scheme are predicted to be negligible on the A16 and A151, meaning that a cumulative assessment of other schemes on these links can be screened out."</i>	quantitative cumulative traffic assessment could not be undertaken. In these circumstances, a proportionate professional judgement was applied based on the information available at the time. The published WMEL scoping information indicated that traffic effects would be principally associated with the A16 and A151 corridors. As set out in Section 15.8 of ES Chapter 15, the Meridian Scheme was assessed as resulting in negligible effects on these links. EIA Regulations⁸ support a proportionate assessment approach, with cumulative assessment focused on receptors where there is potential for a meaningful combined effect. Where an effect is assessed as negligible, there is no realistic potential for that effect to materially influence the significance of a cumulative outcome and detailed cumulative assessment may therefore be screened out on a proportionate basis. Thus, WMEL has been identified as a scoped in scheme in Table 15.35, and a proportionate assessment based on WMEL scoping information enabled further assessment to be screened out, as set out in paragraph 15.11.8.

⁸ UK Government (2017) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/572). London: The Stationery Office. Available at: <https://www.legislation.gov.uk/uksi/2017/572/contents>. Accessed: 29 September 2026.

Reference	Matter Raised	Applicant's Response
		Consequently, and in the absence of detailed WMEL traffic data, it was concluded that a more detailed quantitative cumulative assessment could reasonably be screened out at that stage. Since submission of the ES, additional WMEL Stage 2 consultation information has become available⁹. However, the information currently available remains insufficient to undertake a quantitative cumulative assessment, as detailed workforce travel forecasts, peak hour traffic forecasts and final traffic assignments have not yet been published. The Applicant therefore acknowledges the potential for cumulative interaction with WMEL but maintains that there is currently no evidence to indicate that the conclusions of ES Chapter 15: Traffic and Access [APP-066] would materially change. The information published to date confirms the potential for overlap, which was already included within the assessment, but does not provide a sufficient basis to revise the significance conclusions reported within ES Chapter 15: Traffic and Access [APP-066]. In respect of Ossian Wind Farm, the Applicant notes that the scheme has subsequently been withdrawn. Notwithstanding

⁹ NGET (2026) Weston Marsh to East Leicestershire Stage 2 Consultation. Available at: <https://www.nationalgrid.com/the-great-grid-upgrade/weston-marsh-to-east-leicestershire> [Accessed 29 September 2026]

Reference	Matter Raised	Applicant's Response
		this, no Ossian Wind Farm traffic flows were included within the cumulative traffic assessments presented within ES Chapter 15: Traffic and Access [APP-066]. Accordingly, the withdrawal of the scheme does not affect the cumulative traffic assessment results or the conclusions of the ES, as the reported cumulative effects were not reliant upon traffic associated with Ossian Wind Farm. The Applicant therefore considers that the cumulative assessment was undertaken on a reasonable and proportionate basis using the information available at the time of submission, and that neither the subsequent withdrawal of Ossian Wind Farm nor the additional information currently available for WMEL materially alters the conclusions of the traffic and transport assessment.
5.19	LCC are of the opinion that the Applicant's assertion that traffic flow would be limited and relying on the predicted negligible effects for Meridian in isolation on the A16 and A151 is not acceptable justification for screening it out at this point. Given the overlapping nature of the WMEL and Meridian schemes every effort should be made to consider these schemes cumulatively. LCC are aware that the WMEL project is due to undertake its stage 2 consultation in Autumn 2026 at which point further technical assessments are expected to be available and	The Applicant notes Council's position and agrees that, where sufficient information is available, cumulative effects should be assessed in accordance with the EIA Regulations. However, the Applicant considers that the approach adopted within the ES was reasonable and proportionate based on the information available at the time of assessment. Whilst WMEL was identified as a relevant cumulative scheme, detailed traffic flow forecasts, traffic assignments, workforce travel forecasts and peak construction traffic information were not publicly available. In the absence of this information, it was not possible to undertake a robust quantitative cumulative assessment.

Reference	Matter Raised	Applicant's Response
	may enable a more comprehensive assessment of cumulative effects to be undertaken.	The Applicant does not agree that WMEL was inappropriately screened out. WMEL was not screened out, a proportionate assessment was undertaken based on the information available at the time. The published WMEL scoping information indicated that traffic effects would be primarily associated with the A16 and A151 corridors. As set out in ES Chapter 15: Traffic and Access [APP-066], the Scheme was assessed as giving rise to negligible traffic and transport effects on these links. EIA Regulations¹⁰ support a proportionate assessment approach, with cumulative assessment focused on receptors where there is potential for a meaningful combined effect. Where an effect is assessed as negligible, there is generally no realistic potential for that effect to materially influence the significance of a cumulative outcome and detailed cumulative assessment may therefore be screened out on a proportionate basis. The Applicant acknowledges that the WMEL Stage 2 consultation material subsequently published provides further information. The Applicant agrees that cumulative interactions should be considered wherever sufficient information exists. However, despite the additional information now available, detailed workforce travel forecasts, peak-hour traffic forecasts and final traffic assignments for WMEL have still not been

¹⁰ UK Government (2017) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/572). London: The Stationery Office. Available at: <https://www.legislation.gov.uk/uksi/2017/572/contents>. Accessed: 29 September 2026.

Reference	Matter Raised	Applicant's Response
		published. Consequently, there remains insufficient information to undertake a robust quantitative cumulative assessment. The Applicant re-iterates that the ES did not seek to exclude WMEL from consideration, but rather recognised the limitations of the available information and applied a proportionate assessment approach consistent with EIA practice. The Applicant welcomes the publication of further WMEL technical information and remains willing to review cumulative interactions as additional information becomes available. Based on the information currently available, however, there is no evidence to indicate that the conclusions of ES Chapter 15: Traffic and Access [APP-066] would materially change.
5.20	LCC are of the opinion that further information and justification, as set out above, is required in order to fully understand and assess the impact of the Meridian scheme. The Council currently considers that traffic and access impacts of this development would be negative.	The Applicant notes the LCC's view that further information and justification is required to fully understand and assess the impacts of the Scheme, and has sought to provide clarification in the responses above. The Applicant considers that the Environmental Statement, Transport Assessment and supporting traffic and access documentation provide a robust and proportionate assessment of the Scheme's likely traffic and transport effects based on the information available at the time of submission. The assessment has identified the Scheme's impacts both in isolation and cumulatively with other relevant developments, together with the mitigation and management measures proposed to minimise adverse effects.

Reference	Matter Raised	Applicant's Response
		The Applicant acknowledges that a number of matters raised by LCC relate to the refinement of management plans and the availability of information associated with third-party developments, particularly in relation to cumulative effects. The Applicant remains committed to engaging constructively with LCC throughout the Examination and will continue to provide clarification and additional information where appropriate. The Applicant therefore considers that the likely traffic and access effects of the Scheme have been appropriately assessed and that suitable mechanisms are in place to manage and mitigate impacts throughout the construction, operation and decommissioning phases of the Scheme. The conclusions of the Environmental Statement are robust, and identify that the Scheme will not result in residual significant adverse environmental effects in terms of traffic and transport.

3.6. Public Rights of Way (PRoW)

Table 3-6: Public Rights of Way

Reference	Matter Raised	Applicant's Response
6.1	The application details have been reviewed by the Council's Public Rights of Way and Access officers, including the draft DCO [APP-028] and the outline PRoW-MP [APP-281]. The Council has a number of concerns regarding the breadth of the powers being	The Applicant notes LCC's comments regarding the draft DCO [REP1-006] and the Outline Public Rights of Way Management Plan (oPRoW-MP) [AS-026]. The Applicant considers that the powers sought within the draft DCO [REP1-006], together with the commitments secured

Reference	Matter Raised	Applicant's Response
	sought in the DCO, the lack of clarity on PRow closures and the insufficient detail provided on how PRow would be managed. The application documents, as currently submitted, do not provide an adequate level of certainty or sufficient safeguards to ensure the continued protection of the public's access to and use of the network.	through the oPRow-MP [AS-026] and other documents, provide an appropriate and proportionate framework for the management of PRow during construction, operation and decommissioning of the Scheme. The requirements of the DCO have been drafted to ensure that any interference with the existing PRow network is minimised and subject to appropriate controls and approvals. The Applicant acknowledges LCC's desire for greater certainty regarding temporary closures, diversions and management arrangements. However, at the application stage it is not possible or practicable to identify the precise timing, duration and extent of all temporary PRow management measures that may be required during construction. For this reason, the draft DCO [REP1-006] and oPRow-MP [AS-026] adopt a framework approach that secures the relevant principles, commitments and approval mechanisms whilst retaining sufficient flexibility to respond to detailed construction planning and Scheme progresses. The Applicant emphasises that temporary closures and diversions would only be implemented where necessary and would be kept to the minimum extent and duration reasonably practicable during the construction phase. Access for users would be maintained wherever possible through alternative routes, diversions or other suitable measures, with appropriate signage, notification and stakeholder engagement undertaken in advance of any restrictions being implemented.

Reference	Matter Raised	Applicant's Response
		The oPRoW-MP [AS-026] sets out the measures that will be applied to protect public access, maintain user safety and manage interactions between construction activities and PRoW users. These measures include route management, signage, communication procedures, monitoring arrangements and the reinstatement of routes following completion of the relevant works. Any temporary closures or diversions would be undertaken in accordance with the powers and controls secured through the DCO and relevant statutory processes. The Applicant therefore considers that the Application documents provide an appropriate level of certainty at this stage of the project and include suitable safeguards to protect the continued use and enjoyment of the PRoW network. The Applicant remains committed to ongoing engagement with LCC and other stakeholders throughout the examination process and, where appropriate, will continue to consider opportunities to further clarify the management arrangements set out within the oPRoW-MP [AS-026] and associated application documents.
6.2	The Council consider that the powers being sought in the draft DCO are excessively broad. Article 13 (1) as currently drafted appears to permit the closure of any PRoW for 'any reasonable time' a position that is considered to be insufficiently defined and potentially disproportionate. While the Council acknowledges the limitations at Article 13 (4b) on the broad powers at	The Applicant does not agree that the powers sought under article 13 of the draft DCO [REP1-006] are excessively broad or disproportionate. The drafting of article 13 follows the approach in the model provisions and is consistent with recent solar DCO precedent. In particular, comparable provisions allowing the relevant powers to be exercised for "any

Reference	Matter Raised	Applicant's Response
	Article 13 (1), it remains the view that further details and clearer parameters should be included in the outline PRow-MP to provide greater certainty regarding how these powers would be applied in practice.	reasonable time" are contained in article 12 of the Tillbridge Solar Order 2025 and the One Earth Solar Farm Order 2026. The powers are also subject to appropriate controls. Where a public right of way is specified in Schedule 6 to the draft DCO, the Applicant must first consult the street authority before exercising the relevant powers. In respect of other public rights of way, the consent of the street authority is required, and the street authority may attach reasonable conditions to that consent. The oPRow-MP [AS-026] provides further project-specific detail as to how the powers are anticipated to be exercised in practice. It confirms that access and connections to existing PRowS will be maintained during construction, save for two identified PRowS where temporary closures of approximately 4 to 6 weeks are anticipated. No permanent PRow diversions are proposed. It also sets out measures to minimise disruption to PRow users, including the use of temporary diversions to avoid closures where practicable. The Applicant therefore considers that the controls contained in article 13, together with the measures already set out in the oPRow-MP [AS-026], provide an appropriate and proportionate framework for the exercise of these powers while retaining the flexibility necessary to respond to detailed construction requirements. No amendment to article 13 is therefore considered necessary.

Reference	Matter Raised	Applicant's Response
6.3	Clarity is considered to be required on the duration of any PRow closures. Whilst noting paragraph 3.1.1 of PRowMP states 4 to 6 weeks the Councils PRow and Access Officers would welcome further dialogue with the Applicant regarding closure duration which should be clearly defined and consistent with the approach under the Road Traffic Regulation Act 1984.	The Applicant acknowledges LCC's wish for further clarity regarding the duration of temporary PRow closures. The Applicant will engage in further dialogue with LCC on this matter and will provide clearer information on the anticipated length of closures within the detailed PRow-MP once this is known through the detailed design and planning process. At this stage, the precise duration of individual closures cannot be confirmed with certainty, as this will depend upon the final construction methodology, programme and site-specific requirements. However, the Applicant remains committed to ensuring that any temporary closures are limited to the minimum extent and duration reasonably necessary to undertake the works safely. As set out within paragraph 3.1.1 of the oPRow-MP [AS-026], it is currently anticipated that temporary closures would typically be short-term in nature, generally in the order of 4 to 6 weeks where required. The Applicant welcomes continued engagement with LCC's PRow Officers during the examination process to further develop and clarify the proposed approach. Any temporary closures will be appropriately managed, communicated and subject to suitable mitigation measures, including the provision of alternative routes where necessary, to minimise disruption to users of the PRow network.

Reference	Matter Raised	Applicant's Response
6.4	Having regard to Article 13 (4a) and (b) of the DCO, the Council consider that engagement and consultation with its PRoW team should take place prior to the closure of any PRoW and appropriate advance notification provided before any changes are made on site. This would help to ensure that temporary closures are kept to the minimum time frame necessary for works to be undertaken, that any temporary diversion routes are agreed with the Council, particularly in relation to path surfacing and signage arrangement, and that affected routes are reinstated to a satisfactory condition at the end of the construction works.	The Applicant acknowledges LCC's desire for engagement and consultation to take place before the closure of any PRoW and for advance notification to be provided. The Applicant agrees that these are reasonable requests and will update the oPRoW-MP [AS-026] for Deadline 3 accordingly. The Applicant also agrees that temporary closures should be limited to the minimum duration reasonably necessary to safely undertake the works and that affected routes should be reinstated to an appropriate condition following completion of the works. These matters will be addressed through the oPRoW-MP [AS-026] and ongoing engagement with the LCC.
6.5	Furthermore the Council has a system in place for ensuring the PRoW closures through the DCO process are fed into OneNetwork and that publicity is undertaken. Advance notification of any closures is therefore essential to facilitate this process. The Councils PRoW team should be consulted on, and agree, the timing and extent of any closures, and routes should be reopened as soon as practicable when works are not actively taking place. The Council therefore recommends that additional provisions are included within the outline PRoW-MP to secure these measures. The inclusion of such requirements would go some way towards addressing the Council's concerns regarding the broad scope of the powers provided under Article 13.	The Applicant acknowledges the LCC's desire for closures of PRoW to be fed into OneNetwork and sufficiently publicised, and for the LCC's PRoW team to be consulted on and agree to the timing and extent of any closures. The Applicant will review the wording and update these commitments in the oPRoW-MP [AS-026] by Deadline 3. The Applicant also agrees that closures should be limited to the minimum duration reasonably necessary and that routes should be reopened as soon as practicable where works are not actively taking place and where it is safe to do so. The Applicant will review the wording within the oPRoW-MP [AS-026] to provide further certainty regarding the management of temporary closures and diversions for Deadline 3.

Reference	Matter Raised	Applicant's Response
6.6	The proposed use of PRow by construction or operational vehicles gives rise to a number of concerns, including the potential need for surfacing improvements, on going maintenance, the legal basis for this use, and the displacement of public access. The Council considers that the developer should be responsible for funding and undertaking any necessary upgrades and ongoing maintenance related to this use. In addition, the DCO should clearly define the legal status under which this use would be authorised. The DCO, or alternatively the outline PRow-MP, should confirm that the rights of pedestrians and other legitimate users of the PRow network take precedence over construction and operational vehicle movements, ensuring that public access is maintained.	The Applicant notes the LCC's comments regarding the use of PRow by construction and operational vehicles. The Applicant acknowledges that, where PRow are proposed to be used for construction or operational access, appropriate consideration will need to be given to matters such as route condition, any necessary upgrades, maintenance requirements, user safety and the continued operation of the PRow network. 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. The Applicant also acknowledges the importance of maintaining public access and minimising disruption to PRow users. Construction and operational activities affecting PRow will be managed through the oPRow-MP [AS-026] and other management plans (such as the OCEMP [REP1-061]), with appropriate controls implemented to ensure the safe management of vehicles and PRow users. The Applicant agrees that the rights and safety of PRow users must be appropriately protected and will continue to engage with LCC regarding the most appropriate means of reflecting

Reference	Matter Raised	Applicant's Response
		this within the DCO documents. The Applicant will review the wording within the oPRoW-MP [AS-026] for Deadline 3. The Applicant considers that the detailed management arrangements, including any route improvements, maintenance responsibilities, user protection measures and relevant access rights, can be secured through the final PRoW-MP as well as the powers and controls contained within the DCO.
	To strengthen the outline PRoW-MP content, purpose and enforceability the Council also suggests revision and clarification in the following areas.	The Applicant notes LCC's suggestion and clarifications to the oPRoW-MP [AS-026] and welcomes the constructive feedback. The Applicant is committed to working with LCC to ensure that the final document provides a robust and proportionate framework for the management of PRoW throughout the life of the Scheme.
6.7	No new gates or restrictions should be introduced that would limit public use. Gates should be used to control vehicles running over the PRoW. Where crossings are required gates should be provided for vehicles and not the public, to reinforce priority of users.	The Applicant acknowledges LCC's comment and will provide a commitment to not providing gates or restrictions which would limit public use in the oPRoW-MP [AS-026] to be updated by Deadline 3. The Applicant does not propose to introduce new gates, barriers or restrictions that would unnecessarily limit public access to PRoW. Where measures are required to manage vehicle movements across or along PRoW, the Applicant agrees that the design of such measures should seek to maintain user

Reference	Matter Raised	Applicant's Response
		convenience and clearly reinforce the priority of pedestrians, cyclists, horse riders and other legitimate users. The Applicant is committed to working with LCC to ensure that any crossing points are designed with user safety, accessibility and the continued use of the PRow network as key considerations.
6.8	Temporary diversions should maintain equivalent public accessibility.	The Applicant acknowledges LCC's comment on this matter and will provide a commitment to minimising disruption to public accessibility on all PRow temporarily diverted by the Scheme in the oPRow-MP [AS-026] to be updated by Deadline 3.
6.9	The communications strategy should include regular meetings with the Council's PRow team. Programmes and closure schedules should be shared in advance.	The Applicant acknowledges LCC's comment on this matter and will include a commitment to holding regular meetings with the LCC's PRow team and sharing closure schedule in advance of the works in the oPRow-MP [AS-026] to be updated by Deadline 3.
6.10	The closure of footpaths Crow/12/1 and Wstn/3/1 should be advertised on site at least 4 weeks in advance. Signage must include clear diversion information.	The Applicant acknowledges LCC's comment and will provide a commitment to advertising the closures of these PRow at least 4 weeks in advance and providing clear diversion signage in oPRow-MP [AS-026] to be updated by Deadline 3.
6.11	Enhancement to the PRow network is proposed through the creation of a permissive path which is welcomed. Whilst the inclusion of permitted paths is in general supported, they are not protected routes and remain temporary whilst the proposed development is active. It is recommended that the routes are dedicated as PRow	The Applicant has proposed permissive paths as a proportionate means of delivering recreational and accessibility benefits alongside the Scheme, whilst retaining flexibility to manage the operation, maintenance and long-term use of land required for the Scheme. The permissive paths would provide additional

Reference	Matter Raised	Applicant's Response
	instead, which would allow them to be protected in perpetuity, recorded on Ordnance Survey plans, and provide a permanent betterment as an outcome of the proposal.	connectivity and access opportunities for local communities throughout the operational life of the Scheme. Whilst the Applicant acknowledges the Council's preference for the dedication of these routes as Public Rights of Way, the Applicant does not consider it necessary or appropriate for the proposed permissive routes to be dedicated as permanent PRow. The purpose of the enhancement is to provide access benefits associated with the Scheme, rather than to create new permanent highway rights over land that will be returned to the landowner following decommissioning and restored to its previous condition. Nevertheless, the Applicant considers that the proposed permissive path network would deliver a meaningful enhancement to local access and recreation opportunities for the duration of the Scheme and represents a positive benefit when compared with the existing baseline. The Applicant therefore remains of the view that a permissive path approach provides an appropriate and proportionate mechanism for delivering these enhancements whilst ensuring the continued operation and management of the Scheme.
6.12	In consideration of the application documents concerning rights of way, the Council maintains that the temporary impacts on footpaths during the construction phase are likely to result in a detrimental impact on the accessibility	The Applicant acknowledges that temporary construction activities may result in some disruption to PRow users. However, these effects would be temporary, managed through the oPRow-MP [AS-026], and minimised through measures

Reference	Matter Raised	Applicant's Response
	and functionality of the wider PRow network. Consequently, the overall effect on PRow is considered to be negative.	such as advance notification, temporary diversions where required, and reinstatement of affected routes following construction. The Applicant also proposes enhancements to the local access network through the provision of permissive paths, providing additional connectivity and recreational opportunities during the operational life of the Scheme. Accordingly, whilst temporary adverse effects (not significant) may occur during construction, the Applicant considers these effects can be appropriately managed and should be balanced against the longer-term access benefits delivered by the Scheme.

3.7. Flood Risk and Water Resources

Table 3-7: Flood Risk and Water Resources

Reference	Topic	Matter Raised	Applicant's Response
7.1	Baseline flood risk	Mapping indicates that the flood risk from fluvial flooding to the solar development area and inter array connections is high. The majority of the area is located in Flood Zones (FZ) 2 and 3. The mapping does not take account of flood defences. Land Parcel A is entirely within FZ3, land parcels B and D are predominantly within FZ's 2 and 3. Land Parcel C is	The Applicant acknowledges this matter raised, with no further comment.

Reference	Topic	Matter Raised	Applicant's Response
		also located within FZs 2 and 3, however, the eastern portion of this area lies within FZ1.	
7.2		The majority of the site is generally considered to be at low risk of surface water flooding, with small areas of medium to high risk associated with areas of low topography. Residual tidal risk from the River Welland is stated as being low owing to the tidal sluices at Spalding. The Council notes however that the Applicant's statements on tidal flood risk have been questioned by the Environment Agency in their Relevant Representations [RR-047; point EA10].	Following the Environment Agency's (EA) EA10 comment in the Relevant Representation Report (REP1-074), the Applicant has revised the ES Appendix 11-3 Flood Risk Assessment (FRA) [REP1-050] to provide additional assessment of the EA flood defence assets located near the Scheme and clarification of the tidal flood risk to the Scheme. ES Chapter 11: Hydrology and Flood Risk [REP1-020] has also been updated accordingly.
7.3		The grid connection route generally sits within an area of high fluvial flood risk, within FZs 2 and 3, but is stated by the Applicant not to be at risk of tidal flooding. mapping shows the area to be largely at very low risk of surface water flooding.	Following the Environment Agency's (EA) EA10 comment in the Relevant Representation Report (REP1-074), the Applicant has revised ES Appendix 11-3: FRA [REP1-050] and ES Chapter 11: Hydrology and Flood Risk [REP1-020] to confirm the tidal flood risk to the Scheme is reduced by the presence of the flood defences, and that there is a low residual tidal risk from the River Welland if the lock or flood defences were to fail or overtop.
7.4	Site selection and the application of	The Applicant's Site Selection Report (SSR) (Appendix D of the Planning Statement [APP-264] sets out the range of assessment criteria that were used in site selection, referencing guidance provided in NPS EN-3 and EN-5. At a regional level, this included irradiance	The Applicant has provided further information on the consideration of flood risk at a strategic site selection level within Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35).

Reference	Topic	Matter Raised	Applicant's Response
	Sequential and Exception tests	and topography, network connections, land holdings, ALC grading and land type, planning and environmental designations. Also included in this regional level evaluation was flood risk. However, paragraph 3.3.30 of the SSR emphasises that during the site selection stage, the secured grid connection at Weston Marsh was the starting point for the identification of land suitable for solar development, adding that grid connection points/National Grid substations with available capacity are finite and should be fulfilled wherever possible.	
7.5		In light of this example, and in the context of being able to design a scheme that is wholly compliant with flood risk policy, it would be helpful to understand why the site selection approach did not pursue this avenue further, through identification of potentially lower flood risk sites that jointly could deliver the same power output. This point is expanded on below with respect to the relatively large area of FZs 1 and 2 to the south and southeast of the proposed PoC at Weston.	The Applicant addresses this point at Section 3.2 of Post ISH1 Note: Sequential and Exception Test (Doc Ref. 8.36). Whilst isolated areas of Flood Zone 1 are present within the wider search area, the Applicant did not identify any single contiguous area capable of accommodating the Scheme's land requirements. The Flood Zone 1 land is generally fragmented and dispersed across the wider landscape. The Applicant therefore considered whether a number of smaller areas could collectively provide a lower-risk alternative.
7.6		In the SSR [APP-264], at paragraph 3.3.34, there is cross-reference to Figure 3-7 (Flood Risk planning map) and to what are described as 'pockets' of FZ 1 to the south of Weston, stating that they could not fully accommodate an NSIP scale solar development of this	The Applicant concluded that no lower-risk site, or combination of lower-risk sites, was identified that would provide a clearly preferable overall outcome

Reference	Topic	Matter Raised	Applicant's Response
		scale alone or in combination. The Council assumes that this statement is predicated on land parcels having to be over a certain size, therefore if that restriction had been relaxed then it is highly likely that potentially more sustainable sites with lower flood risk may have emerged as part of a regional- / strategic-based approach to site selection.	when considered against the Scheme's generating capacity requirements, connection needs, land availability, environmental constraints and deliverability considerations
7.7		Furthermore, the area described as having 'pockets' of FZ1 is actually a relatively large area of FZs 1 and 2, lying between Whaplode Drove and Whaplode, with an area of FZ3 in the centre. It is also an area that sits closer to the PoC than the proposed solar development area. The Council would highlight that Figure 11-3: Fluvial Flood Risk Sheet 1 of 7 [APP-108] illustrates this area very clearly in terms of flood risk.	
7.8		Taking this point further, at paragraph 3.3.34 of the SSR [APP-264], the Applicant lists four reasons as to why the lower risk flood risk zones to the south of Weston were not taken forward in the assessment of alternatives. Firstly, there is reference to landowners not willing to put land forward for the scheme, recognising the Applicant's aim to secure land parcels by voluntary agreement where possible. In this regard, it is useful to return to the definition of a 'reasonably available site', where it states that in considering alternative lower risk sites, such sites do not need to	The PPG recognises that in some cases, it may be relevant to consider whether large scale development could be split across a number of alternative sites at lower risk of flooding but only where those alternative sites would be capable of accommodating the development in a way which would still serve its intended market(s) as effectively. Guidance is provided at paragraph 028 of the PPG as to what a 'reasonably available' site could be.

Reference	Topic	Matter Raised	Applicant's Response
		be owned by the Applicant to be considered 'reasonably available'. Whilst the Council recognises the applicant's preference to secure land parcels by voluntary agreement, this part of the PPG does make it clear that land ownership in itself should not be an impediment to the consideration of alternative sites in lower flood risk areas. In that regard the Council would expect to have seen further commentary in respect of the rationale for discounting any potential alternative sites that lie within FZs 1 and 2 to the south of the PoC.	In this context, this requires consideration of whether a combination of smaller sites could collectively: • Accommodate the generating capacity necessary to meet the identified need (i.e. 750 MW); • Connect efficiently and in a deliverable manner to the proposed Weston Marsh substation; • Accommodate the associated infrastructure, including substations and mitigation; • Be assembled, consented and delivered within an equivalent programme; and • Operate as an integrated Scheme without requiring an excessive or materially more disperse network of connecting infrastructure. In terms of compulsory acquisition, given the length of time the Solar Development Area would be required by the Applicant (up to 40 years), it does not seem reasonable to seek permanent acquisition of land without the agreement of the landowner, particularly when there are willing landowners with suitable sites available. These considerations need to be assessed collectively rather than in isolation, taking into account both the characteristics of the land required to host the Solar
7.9		In respect of crown land, it is not clear to what extent this restriction applies within the lower flood risk areas. Similarly, clarity on what the Applicant is referring to in respect of land already developed would be welcomed, since the area of mainly FZs 1 and 2 sitting between Whaplode and Whaplode Drove is predominantly agricultural, similar in nature and scope to the proposed solar development area. Likewise, the reference to 'built up areas' is questioned, since the density of settlements within this area appears to be very similar to that occupied by the proposal.	

Reference	Topic	Matter Raised	Applicant's Response
			Development Area and the infrastructure required to connect it to the transmission network.
7.10		In making these comments in relation to site selection and the extent of FZ1 and FZ2 to the south and southeast of the Weston PoC, the Council do recognise that the area sits within an area of high likelihood of BMV, nonetheless, some further justification for not pursuing more land for potential inclusion in the development within these lower flood risk zones would be welcomed.	Land to the far west of the PoC that is identified as Flood Zone 1 and Grade 3 is beyond the 15km search area (approximately 24km), and would also require the transmission infrastructure to overcome engineering constraints including crossing the River Welland. The assessment within Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35) demonstrates that these considerations need to be assessed collectively rather than in isolation, taking into account both the characteristics of the land required to host the Solar Development Area and the infrastructure required to connect it to the transmission network.
7.11		With reference to figure 3-7 flood risk planning map of the SSR, in terms of regional- or strategic-level approach to site selection, it would also be helpful to understand the rationale for not exploring the option of developing land to the west of the PoC, where there is a clear change in flood risk in the area to the north of Bourne. As was referenced in Section 7 with respect to BMV, if it is considered that a grid connection corridor of 13km (or 15km if to Weston March A) is feasible and deliverable, then by arcing that length westwards from the PoC it starts to encompass land that sits within areas of lower flood risk (in the same way as the land is less likely to fall into a lower likelihood of BMV category. Section 3.3.33 of the SSR does refer to this area and cites some constraints, but there is limited in depth analysis to demonstrate that this was a robust	

Reference	Topic	Matter Raised	Applicant's Response
		and strategic-level approach looked at early on in the site selection process.	
7.12		In terms of site-specific flood risk, the Applicant has undertaken flood modelling as part of the FRA to support the application of the sequential test and to aid decisions on siting of critical solar infrastructure. In almost all cases, critical infrastructure (400 kV substation and BESS compound; 132 kV substation and most solar stations) has been sited outside areas of highest flood risk (3b), with the exception of six solar stations in Gotts catchment, land parcel D.	The Applicant notes this comment.
7.13		The Applicant states that it has not been possible to site those six solar stations outside of the functional floodplain without either acquiring additional land (noting that surrounding land is also FZ 3b) or removing the land parcels from the solar development areas, which would reduce the generating capacity of the project. The mitigation proposed for the placement of these stations in FZ 3 is to raise the solar stations onto plinths up to 1.35m in height to provide 600 mm of freeboard to ensure operation in times of flood. In combination with panel support structures, modelling indicates that displacement of floodplain would not result in any significant change in flood depth and would not materially increase flood risk elsewhere. On this basis the Applicant contends that the scheme, in	The Applicant acknowledges this comment. Additional supporting documentation has been prepared for Deadline 2 within Post ISH1 Note: Sequential and Exception Tests (Doc Ref. 8.36), to further clarify the Applicant's position with regards to the application of the Sequential and Exception Tests for the Scheme.

Reference	Topic	Matter Raised	Applicant's Response
		respect of infrastructure placed in FZ 3b meets the exception test as the embedded mitigation demonstrates that the development will be safe for its lifetime.	
7.14		A considerable amount of bunding is also proposed around infrastructure proposed in the floodplain. The Council notes that the Environment Agency, in their relevant representation [RR-047], have raised concerns over the extent, layout and function of these bunded areas and their cumulative impact on floodplain storage, flows and maintenance. We will defer to the EA's expertise in providing detailed assessment on such matters to ensure that the ExA has confidence that the sequential and exceptions tests have been met across all parts of the development. In respect of the bunding, given the extensive use of these mitigation features cumulatively, we would agree with the EA that a quantified map showing their full extent would be helpful, and would assist in any further assessment that may be required from a landscape and visual perspective, should that be deemed necessary.	The Applicant has responded to the EA's Relevant Representation comment in EA14 of the Relevant Representations Report (REP1-074) that refers to impact of flood bunding. Paragraphs 5.3.26, 5.3.52 to 5.3.59, Table 5-5, Table 5-8 and Section 8 of the revised 6.3 ES Appendix 11-3 FRA [REP1-050] identify where bunding 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 provided. Figure 1-5 in ES Appendix 11-3: Flood Risk Assessment - Annex D [REP1-049] identify the locations where bunding or a flood defence wall is required for solar stations. 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 ES Appendix 11-3: FRA Annex B [REP1-048]), using the maximum bund width to assess floodplain to assess floodplain loss. As such, the depth change volume assessment reported in the 6.3 ES Appendix 11-3: FRA [REP1-050] accounts for the reasonable worst-case

Reference	Topic	Matter Raised	Applicant's Response
			bunding impact, whilst in practice some of the Solar Stations can also be raised on plinths instead which reduces floodplain loss. The flood depth change assessment demonstrates that the change is non-material and results in no significant effects. Further detail of bunding for the solar stations will be designed in the next stage of detailed design post DCO consent. The Applicant does not consider that further assessment of bunding used for solar stations and on-site substations would be required from a landscape and visual perspective. Any bunding would be viewed within the context of the infrastructure of the Solar Development Area and would not result in additional effects to those already considered within ES Chapter 12: Landscape and Visual [APP-063]. Views of bunding would be limited, as the lower levels of solar stations and on-site substations are screened by solar panels, existing and proposed landscape planting. Photomontages produced for on-site substations did consider landscaped earth bunds, however, these are not visible from the off-site viewpoint locations.
7.15		In terms of compliance with the second limb of the exception test, the Applicant relies on the provision of wider sustainability benefits through the scheme contributing to the UK's net zero and energy security goals at a national level. They also refer to benefits	The Applicant notes this comment. Additional supporting documentation has been prepared for Deadline 2 within Post ISH1 Note: Sequential and Exception Tests (Doc Ref. 8.36), to further clarify the

Reference	Topic	Matter Raised	Applicant's Response
		cited in section 4.3 of the Planning Statement [APP 260], including co-located BESS, skills and employment generation, provision of a permissive path between Queens Bank and Shepeau Stow, biodiversity and landscape enhancements, and recovery of agricultural land.	Applicant's position with regards to the application of the Sequential and Exception Tests for the Scheme.
7.16		The Applicant refers to the opportunity for intensively farmed land to recover and for carbon to be stored over the operational life of the project, also citing biodiversity and 'continued' livestock grazing. Reference to this first point on recovery of soils is included in this LIR at section 15. It is unclear what the term 'continued' livestock grazing refers to as the Council understands this does not currently happen, with the agricultural land in question being dominated by arable use. Further, it is understood that the prospect of grazing is not guaranteed and depends on a number of factors, not least the availability of willing graziers. In this part of the County, where grazing is currently not typical, this is likely to be difficult to secure.	The Applicant notes this comment and agree that currently this land is not used for grazing. 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 OLEMP [REP1-070] recognises the potential for the land around the solar panels to remain in agricultural use for sheep grazing during operation of the Scheme, although it is agreed that this will depend on local availability/expertise in doing so. Whilst this is referenced as a potential option, the Applicant has not relied upon it to determine the significance of effects within the ES nor within the assessment of planning balance set out within the Planning Statement [APP-260].
7.17		The FRA and associated documents have been reviewed by the Council in its capacity as Lead Local Flood Authority (LLFA). The LLFA considers these documents provide, at this stage, a suitable assessment of the surface water flood risk and how it will be	The Applicant notes this comment. Mitigation embedded within the drainage design is secured through compliance with ES Appendix 11-4: Outline

Reference	Topic	Matter Raised	Applicant's Response
		mitigated by the development. The detailed measures of the larger impermeable areas created for the 400kV substation, the BESS Compound and the three 132kV substations, plus solar stations will need to be approved at the detailed design stage and the LLFA would expect these mitigation measures to be secured within the draft DCO. The detailed design of any SuDs schemes proposed will need to be conditioned and approved, ensuring that greenfield runoff is not exceeded.	Drainage Strategy [APP-227] in accordance with Requirements 5 and 10 of the Draft DCO [REP1-006].
7.18	Water quality and resources	Measures to prevent pollution and flooding are also included in the approach to ensure no adverse impacts on water quality, which can be embedded into the oCEMP, the oOEMP and the oDEMP, supplemented with a Water Management Plan (WMP) and the aforementioned outline drainage strategy. Providing these documents are adequately secured through the DCO, then the Council would agree that this approach is proportionate and appropriate to control potential impacts of the development on water resources and quality.	The Applicant notes this comment. Environmental Mitigation and Commitments Register [REP1-057] summarises the mitigation relied upon, including the environmental management plans, and the corresponding securing mechanisms.
7.19		In conclusion, notwithstanding the comments regarding site selection and robust application of the sequential and exceptions tests in areas of higher flood risk, the Council in its capacity as LLFA considers that the effects of the development on flood risk and water	The Applicant notes this comment. Additional supporting documentation has been prepared for Deadline 2 within Post ISH1 Note: Sequential and Exception Tests (Doc Ref. 8.36), to further clarify the

Reference	Topic	Matter Raised	Applicant's Response
		resources have been satisfactorily addressed at this stage and that the impacts of the development on water quality, resources and flooding would be Neutral.	Applicant's position with regards to the application of the Sequential and Exception Tests for the Scheme.

3.8. Cultural Heritage (Built Heritage and Archaeology)

Table 3-8 Cultural Heritage (Built Heritage and Archaeology)

Reference	Topic	Matter Raised	Applicant's Response
8.1	Built Heritage	The Council has reviewed ES chapter 8: Cultural Heritage [APP-059] whilst the overall approach taken is broadly appropriate, this is subject to the resolution of the outstanding matters raised below.	The Applicant notes this comment. Responses to matters raised are provided within rows below.
8.2		The Council notes that the Applicant identifies significant residual operational effects on the historic landscape of the former precinct of Crowland Abbey, scheduled monuments associated with the Crowland Abbey landscape, Wykeham Chapel and the Historic Landscape Character Areas of The Fens and The Wash as stated within [APP-069] ES Chapter 18: Summary of Likely Significant Effects. The Council agrees that these receptors are central to the historic environment impacts of the scheme.	The Applicant notes LCC's position on this matter and has no further comments to make.
8.3	Former precinct of	The effect on the former precinct of Crowland Abbey should be understood as more than visual	ES Appendix 8-2: Historic Environment Desk-Based Assessment (HEDBA) [APP-182] details Crowland's

Reference	Topic	Matter Raised	Applicant's Response
	Crowland Abbey	change. ES Appendix 8-2: Historic Environment Desk Based Assessment explains that Crowland Abbey occupied slightly higher ground, giving rise to the historic understanding of Crowland as an island within the fens. The site lies within the surrounding fen deposits and within the area known as Great Postland. It also notes that the medieval documentary boundaries defined the island of Crowland and its surrounding marshes and that modern parish boundaries still closely reflect the former abbey precinct. The former abbey boundary includes land parcels A, B and C, with Queen's Bank forming the northern boundary. These land parcels therefore fall within a historically meaningful part of the former monastic estate landscape, rather than simply within open agricultural land.	island setting, the medieval documentary boundaries, the close correspondence with modern parish boundaries, and that Land Parcels A–C lie within the historic precinct. ES Chapter 8: Cultural Heritage [REP1-016] describes the Crowland Abbey estate, Queen's Bank and St Guthlac's Cross as a connected historic landscape. 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. 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 through the fenland that they were arriving at or leaving at the abbey lands. While these elements contribute to the cultural significance of the historic estate of Crowland Abbey,

Reference	Topic	Matter Raised	Applicant's Response
			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 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 [REP1-016] has concluded that the Scheme will have an impact on the historic precinct of Crowland Abbey, 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. The assessment is supported by ES Appendix 8-4: Heritage Setting Assessment [REP1-032]. 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 of ES Chapter 8: Cultural Heritage [REP1-016].

Reference	Topic	Matter Raised	Applicant's Response
8.4		The Councils position is that the scheme would affect how this part of the historic landscape is understood and experienced. The concern is not the change to the surroundings of the assets in isolation but the effect of that change on the ability to read the historic relationship between them within the wider setting of the former abbey landscape.	In response to comments received from Historic England regarding the kinetic experience of the views of Crowland Abbey and its associated monument (St Guthlac's Cross and the Scheduled Monument at Queens Bank) when traveling along Queens Bank, Wash Bank and Clout Drove an assessment has been prepared. The Crowland Kinetic Views Assessment [REP1-096] was submitted at Deadline 1.
8.5		In relation to St Guthlac's Cross, the Council acknowledges that the Applicant's baseline notes that the cross is no longer in its original location. However, this does not remove the relevance of its historic and landscape relationship with Crowland Abbey, Queen's Bank and the wider former abbey boundary landscape. The asset remains significant as a medieval boundary marker associated with land formerly held by Crowland Abbey and that significance is still understood through its historic function, association and wider landscape context.	
8.6		The Council also notes that [APP-069] ES Chapter 18: Summary of Likely Significant Effects Table 18-2 records the same moderate adverse significant residual effect for receptors with different sensitivity/value ratings: medium for the former precinct landscape and high for the scheduled monument at settlement W of Cate's Cove Corner and St Guthlac's Cross. In each case the magnitude	The significance of effect on the heritage asset is determined using the methodology set out in ES Chapter 8: Cultural Heritage [REP1-016]. For an asset of High importance, where the magnitude of impact is determined to be Minor, this results in a Moderate Significance of Effect.

Reference	Topic	Matter Raised	Applicant's Response
		of impact is recorded as minor. The Council does not dispute the conclusion but considers that the reasoning should be clearer, particularly where the impact is described broadly as change within setting.	For an assets of Medium importance, where a Medium magnitude of impact is determined, the resulting significance of effect may be Slight or Moderate. Where there are two options for a level of effect, it is a matter of professional judgement to determin the appropriate level. The former precinct landscape of Crowland Abbey is considered as being of Medium Importance due to the historic relationship between the abbey 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. In addition, some long-range views of Crowland Abbey have survived across the wider landscape which contribute to this significance. The assessment presented in paragraph 8.9.51 of ES Chapter 8: Cultural Heritage [REP1-016] identifies that the Scheme will introduce solar panels and the infrastructure to support them into this landscape. The extent of the precinct will still be appreciable in the landscape and areas of agricultural land retained around and between the solar development infrastructure which helps to maintain an understanding of the relationship of the appreciable elements of the former precinct landscape of Crowland Abbey. However, the introduction of the

Reference	Topic	Matter Raised	Applicant's Response
			Scheme will result in a reduced ability to appreciate its cultural significance as a result to changes within historic landscape. As a result of this the assessment concluded that the resulting significance of effect should be the higher Moderate level. As detailed in Tabel 8-9 of ES Chapter 8: Cultural Heritage [REP1-016] no mitigation is proposed in relation to the former precinct landscape of Crowland Abbey, the Scheduled Monuments 'Settlement W of Cate's Cove Corner' (1004979), and St Guthlac's Cross (1005052). As a result, the residual effects reported remain in ES Chapter 18: Summary of Likely Significant Effects Table 18-2 [REP1-022] are not reduced from those reported in ES Chapter 8: Cultural Heritage [REP1-016].
8.7	Wykeham Chapel	In relation to Wykeham Chapel and the Grade I listed Chapel of St Nicholas, the Council notes that the Applicant identifies a significant operational effect and that the level of effect is sensitive to the final siting and form of grid connection infrastructure. The Applicant's assessment records Historic England's concern regarding the effect of Meridian and other overhead line infrastructure on the open agricultural setting of the asset, including views from the access route and from within the chapel through the east window. The Council	The Applicant notes this comment. The Applicant's assessment is set out within Sections 8.9 and 8.12 of ES Chapter 8: Cultural Heritage [REP1-016]. Although the Applicant has endeavoured to minimise effects as far as reasonably practicable 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) from the Scheme on its own and cumulatively with

Reference	Topic	Matter Raised	Applicant's Response
		considers that the least harmful design should be secured through the DCO requirements, including pylon siting, pylon spacing, undergrounding where necessary, access tracks, compounds, planting and other above-ground ancillary infrastructure.	other NGET schemes is identified on the Wykeham Chapel Scheduled Monument and Grade I listed chapel. The final alignment, pylon siting and location of temporary construction access tracks and compounds will be subject to detailed design stage but must be within the parameters incorporated within the Works Plans [APP-009 to APP-010] for the siting of the infrastructure within the Order Limits.
8.8	Historic Farmsteads	The Council notes that historic farmsteads have been considered using the Greater Lincolnshire Farmstead Character Statement (2015). However, the assessment does not apply LCC's NSIP guidance on the group value of historic farmsteads: Historic Places Team, Lincolnshire County Council (2024), Historic Farmsteads Group Value Framework for NSIPs. Given the rural character of the scheme and the number of historic farmsteads within it, this is a notable omission and limits the assessment.	The Applicant met with LCC's Historic Buildings and Landscapes Officer on 19 August 2026 and will continue to seek agreement on heritage matters through the Statement of Common Ground with LCC [REP1-082]. The need for an assessment of historic farmstead group value was first raised by LCC within its Relevant Representation. Following discussions with LCC on 19 August 2026, the Applicant was provided with LCC's <i>Historic Farmsteads Group Value Framework for NSIPs</i> (2026) and begun preparing an additional assessment using that framework. A Historic Farmstead Group Value Assessment (Doc Ref. 8.34) has been submitted at Deadline 2. The assessment considers the collective significance and group value of historic farmsteads within the Scheme
8.9		As a result, the ES assesses farmsteads largely as individual receptors, rather than considering their collective contribution to the historic landscape. This limits the assessment of how the scheme would affect the legibility of the wider fenland settlement pattern. ES Appendix 8-4: Heritage Setting Assessment [APP-203] identifies slight adverse	

Reference	Topic	Matter Raised	Applicant's Response
		effects on non-designated farmsteads and rural buildings. While these effects may not be significant individually in EIA terms, their wider pattern is relevant to understanding the historic character of the landscape.	study area, including their contribution to the historic fenland settlement pattern and, where relevant, their historic relationships with the former abbey precinct landscape. It assesses the extent to which the Scheme may affect the legibility of these historic relationships and any resulting effects on heritage significance. No new significant effects in addition to those set out within ES Chapter 8: Cultural Heritage {REP1-016} have been identified.
8.10		This is particularly relevant to farmsteads within, or historically related to, the former abbey precinct landscape. The ES does not explain whether these assets have collective value as part of that landscape, or how the scheme would affect that relationship.	
8.11	Historic Landscape Character	The Council agrees with the Applicant's assessment that the scheme would result in significant adverse operational effects on Historic Landscape Character within The Fens and The Wash. ES Appendices 12-3 [APP-237] and 12-4 [APP-238] draw on the Historic Landscape Characterisation Project for Lincolnshire (2011)8, which identifies The Fens and The Wash as major historic landscape character areas covering a significant proportion of the southern half of the county. The ES describes these areas as flat, open and predominantly rural landscapes, shaped by rectilinear drainage patterns, dispersed settlement, scattered farmsteads, large skies and long-distance views.	The Applicant notes LCC's position on this matter and has no further comments to make.

Reference	Topic	Matter Raised	Applicant's Response
8.12		The Councils concern is that these effects should not be treated as purely visual effects. In this context, openness, drainage patterns, field morphology, roads, settlement edges and scattered farmsteads form part of the historic structure of the fenland landscape. The introduction of solar PV modules, substations, BESS infrastructure and overhead line infrastructure would alter the way that landscape is read and experienced during the operational life of the scheme.	ES Chapter 8: Cultural Heritage [REP1-016] and the supporting appendices characterise The Fens as a historic landscape, including openness, settlement/farmstead pattern and drainage, and assesses significant operational effects (ES Chapter 8: Cultural Heritage [REP1-016] section 8.7 and section 8.9). The ES Appendix 8-2 HEDBA [REP1-078] includes the Lincolnshire Historic Landscape Characterisation and explains reclamation, drainage and field development (sections 5.1–5.2). The assessment of impact in ES Chapter 8: Cultural Heritage [REP1-016] is not confined to visibility and sets out the impact of the Scheme on the cultural significance of the historic landscape (Paragraph 8.9.53).
8.13		The Council considers that the significant adverse operational effects identified for Historic Landscape Character should be recognised as a material heritage concern. The effect is not simply that new infrastructure would be visible but that the scheme would change the character and legibility of a historic agricultural fenland landscape.	
8.14	Cumulative historic landscape change	The Council also notes that ES Chapter 8 [APP-059] identifies cumulative disruption of the historic landscape character of The Fens and The Wash through the introduction of industrial features into the flat landscape (table 8-11: Cumulative Effects Assessment in relation to Cultural Heritage). The residual cumulative effect is assessed as moderate adverse and significant for the lifespan of the	The Applicant notes LCC's position on this matter and has no further comments to make.

Reference	Topic	Matter Raised	Applicant's Response
		scheme, with an increase in the magnitude of impact as a result of in combination effects.	
8.15		The Applicant's cumulative visibility mapping helps illustrate how this change may be experienced across the wider landscape, rather than only through direct intervisibility between individual assets and individual scheme components. ES Figure 12-17: Barrier Viewshed – Cumulative Overhead Line Developments shows extensive areas of theoretical visibility within the 15km buffer for cumulative overhead line schemes, including Grimsby to Walpole, WMEL and Spalding Energy Expansion. ES Figure 12-18: Barrier Viewshed – Other Cumulative Developments also shows visibility associated with other solar and energy-related schemes across broad parts of the surrounding fenland. The Council recognises that these are theoretical visibility tools and not direct assessments of heritage harm. However, they help demonstrate why cumulative change in this landscape should not be reduced to individual asset intervisibility, or to isolated viewpoints.	The Applicant notes LCC's position on this matter and has no further comments to make.
8.16		The Council notes the ExA's conclusions in the Springwell Solar Farm Recommendation Report (sections 9.4.17 to 9.4.21). The ExA agreed with LCC that cumulative solar and related development	The Applicant notes the findings of the Examining Authority in relation to Springwell Solar Farm. Those conclusions were reached having regard to the particular development, landscape context and

Reference	Topic	Matter Raised	Applicant's Response
		would likely require published landscape character assessments to be updated so that large-scale solar is recognised as a defining land-use characteristic alongside agriculture. The ExA further found that cumulative solar and solar-related development, including non NSIP schemes, represented a clear and marked change to landscape character resulting in a moderate adverse significant effect.	cumulative development scenario considered in that Examination. The Applicant recognises that increasing solar and other energy infrastructure may influence landscape character and that published landscape character assessments may require updating over time to reflect such change. For the Scheme, ES Appendix 12-7: Landscape and Visual Cumulative Assessment [APP-241] considers relevant committed and reasonably foreseeable developments, including other energy infrastructure proposals, and identifies significant cumulative effects where appropriate. The Applicant therefore considers that potential cumulative changes to landscape character have been appropriately assessed and that the findings of the Springwell Examination do not alter the conclusions of the Scheme-specific assessment.
8.17		This is relevant to the historic environment as well as to landscape character. The ES draws on the Historic Landscape Characterisation Project for Lincolnshire, which provides the county-level framework for understanding the historic character of The Fens and The Wash. That framework identifies the historic structure of these landscapes through features such as drainage, enclosure, field pattern, settlement and farmsteads. If large-scale solar, grid and related	The assessment draws on the Historic Landscape Characterisation Project for Lincolnshire and other research as detailed in the ES Chapter 8: Cultural Heritage [REP1-016] and the supporting appendices. The Applicant considers the assessment to be proportionate to the impact of the Scheme on the historic landscape identified.

Reference	Topic	Matter Raised	Applicant's Response
		energy infrastructure become a defining land-use characteristic, this is likely to have consequences for how the historic landscape is understood, described and assessed in future reviews of historic landscape character.	The Historic Landscape Characterisation Project for Lincolnshire also informs the LVIA, which considers the existing characteristics of the relevant Historic Landscape Character Areas and Zones and the effects of the Scheme and cumulative development upon them.
8.18		The Council considers that cumulative historic landscape change should be recognised separately from the individually significant effects identified in the ES.	The cumulative effect on the historic landscape is presented in Table 8-11 of ES Chapter 8: Cultural Heritage [REP1-016].
8.19	Overall Assessment	Limitations in the assessment have also been identified, notably the lack of application of the Historic Farmsteads Group Value Framework and insufficient explanation of how impacts on setting translate into consistent effect conclusions across receptors of differing sensitivity.	See responses to comments 8.6 and 8.12 above.
8.20		The Council considers that cumulative change—particularly from solar and grid infrastructure across The Fens and The Wash—represents a material and distinct heritage impact. This change has the potential to redefine the character of the landscape and affect how it is understood within the Historic Landscape Characterisation framework.	The Applicant notes LCC's position on this matter and has no further comments to make.
8.21		Overall, the Councils position is that the Scheme would result in meaningful and lasting harm to the	The Applicant notes LCC's position on this matter.

Reference	Topic	Matter Raised	Applicant's Response
		historic landscape, both individually and cumulatively, and that these effects should be clearly recognised, robustly justified, and minimised through design and secured requirements. On this basis, the effects of the proposed development on built heritage interests are considered to be negative.	The Applicant considers that these impacts are accurately and proportionately presented in ES Chapter 8: Cultural Heritage [REP1-016]. Mitigation commitments are summarised within the Environmental Mitigation and Commitments Register [REP1-057] alongside the relevant securing mechanisms.
8.22	Archaeology	The Council are 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 scheme. It has confirmed the presence of widespread activity, mainly of Iron Age and Roman date, across the site with a focus on the higher dryer 'roddons', which are silted up former river channels. The following comments build on those provided recently in our Relevant Representation.	The Applicant notes LCC's position on this matter and has no further comments to make.
8.23		There has been an effective programme of desk-based and non-intrusive surveys completed for the site prior to submission of the application, which has enhanced the understanding of the historic environment baseline. The Applicant has completed the ES chapter [APP-059], desk-based assessment [APP-182], aerial assessment [APP-185] and	The Applicant welcomes these comments and has no further comments to make on this matter.

Reference	Topic	Matter Raised	Applicant's Response
		geophysical survey [APP-186] to [APP-196] to the appropriate standards set out by the Chartered Institute for Archaeologists, Historic England and the Lincolnshire Archaeology Handbook. In particular, the Council commend the quality of the geophysical survey and the aerial assessment and the positive contribution they make to the assessment.	
8.24	Planning Statement Appendix E, Heritage Harm Statemen	Within [APP-265], Planning Statement Appendix E, Heritage Harm Statement, it states that all assets which have been identified as experiencing an adverse effect in the EIA have been considered within this document. Adverse effects can be experienced as a direct physical impact on historic fabric or as a result of changes to an asset's setting. effects can also be experienced during the construction of the scheme as short-term or long-term impacts, or as a result of the operation of the scheme. We would point out that impacts may also occur during the decommissioning phase of the project and that these should be included within the assessment.	Effects on the cultural significance of heritage assets at the decommissioning phase, based on the currently known methodology are considered in Section 8.9 of ES Chapter 8: Cultural Heritage [REP1-016] (Paragraphs 8.9.68 – 8.9.72). The methodology for decommissioning would have due regard to health and safety and environmental impacts in accordance with the ODEMP [REP1-065]. It is reported that across the Scheme there is potential that decommissioning works may affect archaeological deposits not previously affected during the construction phase. This potential is considered to be very limited as the physical extent of most works will be within the physical footprint of the areas affected at the construction phase. It is set out in the Outline Archaeological Mitigation and Management Strategy (OAMMS) [REP1-078], submitted at Deadline 1, that the full details of decommissioning methods will be reviewed in relation to the archaeological potential of

Reference	Topic	Matter Raised	Applicant's Response
			the Site to determine an appropriate and proportionate approach to archaeological mitigation. Both NPS EN-1¹¹ and the NPPF¹² 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 significance. As substantial harm has been defined as the permanent loss or near total loss of cultural significance, where an impact is temporary and/or does not result in the permanent loss or near total loss of cultural significance, either during construction, operation or decommissioning Scheme, this is considered less than substantial harm. Based on the assessment of the decommissioning phase it is not anticipated that the works will result in substantial harm. As a result, these potential effects

¹¹ 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]

¹² Department for Levelling Up, Housing and Communities (2026) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Accessed 29/09/2026]

Reference	Topic	Matter Raised	Applicant's Response
			have not been discussed in the Planning Statement – Appendix E Heritage Statement of Harm [REP1-053].
8.25		Within paragraph 3.1.4, it states that for the majority of heritage assets, the ES concludes that the predicted magnitude of impact would result in no more than a moderate adverse change to their cultural significance, due to the scale of the anticipated impact. As a result, it is concluded that the harm caused to these assets, both physically and within their setting, falls within the less than substantial category, or that no harm is caused. The Council would suggest this is likely to be an underestimation of the significance of the impact. The Council do not disagree with the moderate impact, but rather that moderate impacts may be reasonably concluded to be greater than 'less than substantial' in some cases, particularly where the nature of the asset has buried elements that could be more sensitive to change.	The methodology for determining 'harm' or 'less than substantial harm' is detailed in the Section 8.4 of ES Chapter 8: Cultural Heritage [REP1-016] and is discussed in the Applicant's response to the LCC's Relevant Representation comment in LCC-022, within the Relevant Representation Report [REP1-074] submitted at Deadline 1. In line with available policy and guidance, following precedent set through previous NSIP applications (such as Springwell Solar Farm, Mallard Pass and Gate Burton in Lincolnshire), for the purposes of this assessment, 'substantial harm' is defined as the total or near-total permanent loss of their cultural significance.
8.26		The Council do not agree that temporary impacts have in their entirety been automatically deemed as less than substantial as stated within paragraph 3.1.5. Each impact should be assessed on its own basis and a conclusion provided along with the justification how that conclusion has been reached.	The Applicant has responded to the LCC's Relevant Representation comment in LCC-022 within the Relevant Representation Report [REP1-074] submitted at Deadline 1.

Reference	Topic	Matter Raised	Applicant's Response
			Both NPS EN-1¹³ and the NPPF¹⁴ 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 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 [REP1-016] was updated at Deadline 1 to clarify this point. 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

¹³ 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]

¹⁴ Department for Levelling Up, Housing and Communities (2026) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Accessed 29/09/2026]

Reference	Topic	Matter Raised	Applicant's Response
			Statement of Harm (REP1-053), 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.
8.27	Archaeological deposits	Paragraph 4.1.3 states that the area of archaeological deposits to the north of High Road, potentially multi-period and dating from the Palaeolithic, Mesolithic, Iron Age, Roman, medieval or post-medieval periods, would only suffer a major adverse impact if the cable route was underground. If the cable route was above ground, the impact would not be significant. The Council consider this assumption could be incorrect, depending on the sensitivity of any archaeological remains where the posts for the overhead route are located. We agree that any underground cable would likely be more harmful and recommend that the overhead route should be chosen here. We note that in Paragraph 4.1.8 the Applicant concludes that aerial photograph survey and Historic Environment Record data collected to date indicates that the potential for archaeological remains decreases in this northern section of the grid connection route north of High	The Applicant has responded to the LCC's Relevant Representation comment in LCC-029 within the Relevant Representation Report [REP1-074] submitted at Deadline 1. 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

Reference	Topic	Matter Raised	Applicant's Response
		Road when compared to the density of archaeological deposits recorded in other areas of the scheme and consider the archaeological significance here to be medium. The Council would query the medium importance ascribed to remains of Palaeolithic and Mesolithic date, given their scarcity within the region. If the evidence is of a transient and ephemeral nature, such as lithic scatters, then the Council could agree with a medium importance (although note Farndon Fields for example). However, settlement or other more intensive exploitation evidence would be higher. Lithic scatters may also indicate archaeological activity could be present below the ground.	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 paragraph 8.7.31 of ES Chapter 8: Cultural Heritage [REP1-016] and paragraph 4.1.8 of Planning Statement Appendix E Heritage Statement of Harm [REP1-053] at Deadline 1 for clarity.
8.28		The Council would anticipate that where impacts on high importance archaeological remains have been identified, design finalisation should have been made pre-DCO submission to avoid the uncertainty and lack of definitive impact assessment.	The details of embedded mitigation are set out in Section 8.8 of ES Chapter 8: Cultural Heritage [REP1-016]. The layout of the Solar Development Area, including solar PV panels, substations, solar stations and BESS infrastructure has been designed to avoid placement of these or any other infrastructure within the two Scheduled Monuments located within the Site (1004979, 1004978) and a 20m buffer around them. The Scheme layout of solar PV modules has also been designed to avoid impacts on dense groupings of

Reference	Topic	Matter Raised	Applicant's Response
			buried archaeological remains that have been identified within the Solar Development Area. Where infrastructure relating to the Scheme is proposed within areas of archaeological potential, this is due to other factors such as ground conditions and flood risk have also been considered in the development of the design. Following consideration of environmental and engineering constraints, where this has resulted in impacts on areas of cultural significance, appropriate and proportionate mitigation has been designed considering the nature of the archaeological deposits. The details of this are presented in the OAMMS [REP1-078] that has been prepared and was submitted at Deadline 1.
8.29		The Council do not fully agree with the assessment that with mitigation, the harm to the Archaeological Zone 1 spread across Zones B and C would not be significant unless that mitigation was through design, removing the area from the solar arrays or a no-dig solution was found (paragraph 4.1.11). If harm is to occur, the Council would expect appropriate justification to be provided detailing the rationale behind the proposals at this locality.	The Scheme design within Archaeological Zone 1 across Zones B and C includes the location of one of the 132kV substations, a construction compound, access tracks and below ground cabling. The assessment presented in ES Chapter 8: Cultural Heritage [REP1-016] (paragraph 8.9.16) identifies that within the footprint of these elements more extensive ground disturbance will be required than in areas identified for solar panels. Justification for locating the 132kV substation and supporting

Reference	Topic	Matter Raised	Applicant's Response
			infrastructure in this area is provided in ES Chapter 3: Alternatives and Design Evolution [APP-054]. Archaeological mitigation for areas of more extensive ground disturbance is detailed in OAMMS [REP1-078] which has been prepared and was submitted at Deadline 1.
8.30		The Council broadly agree that the construction of a 132kV substation and adjacent construction compound, access tracks, solar PV modules and below ground cabling within Archaeological Zone 1 will likely lead to a greater magnitude of impact and a lesser magnitude of harm within the array areas (paragraph 5.2.4). The Council has noted that there are often additional sources of disturbance within solar array areas, with ground improvements, grading and compaction, drainage channels, plant movement and landscaping all having impacts, which are not fully accounted for in the assessments. Additionally, ground impacts on archaeological remains of higher sensitivity within the array area may still incur an impact of greater magnitude and this should be recognised within the statement of harm. Construction methodology variation, such as needing to compact soils prior to array construction,	OAMMS [REP1-078] has been prepared and 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 [REP1-063] and the ODEMP [REP1-065]. Cross reference to the OAMMS [REP1-078] and works to be supervised by

Reference	Topic	Matter Raised	Applicant's Response
		would be monitored by the Archaeological Clerk of Works (ACoW).	an Archaeological Clerk of Works, where required, has also been added to the OSMP [REP1-068].
8.31		The addition of the chapter on assumptions and limitations [APP-059] section 8.5 is beneficial. The identification of the level of accuracy that can be attributed to the assessment results allows confidence ratings to be built into the proposed iterative mitigation strategy. The requirement for an ACoW will include within their role oversight of the day-to-day activities on site to ensure archaeological considerations are met throughout the lifespan of the project. This flexibility and presence on site is a crucial tool in combating unanticipated impacts or changes to the construction methodology or programme.	
8.32		In regards the assessments, the conclusions contained within ES chapter 8 [APP 059] Section 8.9 Assessment of Potential Impacts and Likely Significant Effects are under discussion and the Council would advise some amendments. The sources of impact from the Operational Phase will be managed through mitigation set out within the forthcoming Archaeological Mitigation and Management Plan, not the oOEMP (Section 8.9.7). Equally, the management of archaeological impacts from the decommissioning phase will be covered in	Effects on the cultural significance of heritage assets during the operation and decommissioning phases, based on the currently known methodology are considered in Section 8.9 of ES Chapter 8: Cultural Heritage [REP1-016] (Paragraphs 8.9.68 – 8.9.72). The methodology for these phases would have due regard to health and safety and environmental impacts in accordance with the OOEMP [REP1-063] and the ODEMP [REP1-065]. It is reported that across the Scheme there is potential that operations/ maintenance and decommissioning works may affect

Reference	Topic	Matter Raised	Applicant's Response
		the Archaeological Mitigation and Management Plan and overseen by the ACoW, not the oDEMP (Section 8.9.9 and 8.9.10)	archaeological deposits not previously affected during the construction phase. This potential is considered to be very limited as the physical extent of most works will be within the physical footprint of the areas affected at the construction phase. It is set out in the OAMMS [REP1-078], submitted at Deadline 1, that the full details of operational maintenance works and decommissioning methods will be reviewed in relation to the archaeological potential of the site to determine an appropriate and proportionate approach to archaeological mitigation. The role of the ACoW is also set out in the OAMMS [REP1-078], and referenced within the OOEMP [REP1-063] and ODEMP [REP1-065].
8.33		There are some outstanding fieldwork requirements, primarily for the grid connection route and inter array connections (Volume 6 Environmental Statement 6.1 ES Chapter 8: Cultural Heritage Para 8.6.37) [APP-059]. The Council are content for these to be undertaken post-DCO and the results incorporated into the final archaeological mitigation and management plan. Any written scheme of investigation must be approved by LCC.	The details of the outstanding archaeological evaluation requirements are set out in the OAMMS [REP1-078]. The detailed AMMS would be approved by LCC in accordance with Requirement 11 of the Draft DCO [REP1-006].
8.34		The Council feels greater clarification is needed regarding the application of significance/importance, the omission of substantial harm within the	The details of the impact assessment methodology, significance of heritage assets and conclusions regarding the potential impact of the Scheme are

Reference	Topic	Matter Raised	Applicant's Response
		temporary impacts and details of the justification regarding substantial/less than substantial harm as applied to the residual impact assessment. The Council are disappointed that no outline Archaeological Mitigation and Management Plan has been included with the DCO application and expect this to be submitted prior to the end of the examination period to allow its review and discussion within the DCO hearings and/or subsequent written deadlines. Areas of Archaeological Potential have been identified (Volume 6 Environmental Statement 6.2 ES Figure 8-5: Zones of Archaeological Potential) [APP-097] and will form the basis for creating the subsequent mitigation and management plans and embedded mitigation is covered within Section 8.	presented in ES Chapter 8: Cultural Heritage [REP1-016]. Planning Statement Appendix E Heritage Statement of Harm [REP1-053] 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 [REP1-016] and Appendix E: Heritage Statement of Harm of the Planning Statement REP1-053 cross reference to avoid repetition and should be read in conjunction with each other. The Areas of Archaeological Potential have been used to inform the OAMMS [REP1-078] submitted at Deadline 1.
8.35		The Council also expect work to have commenced on the Public Archaeology and Community Engagement Strategy (PACES) prior to the DCO examination. The Meridian Solar Project has the opportunity to play a positive role in enhancing the historic environment. The scheme has encountered areas of significant archaeological activity and utilising this asset for public benefit is highly recommended in the recently adopted Archaeology and Solar Farms Practice Guide under Principle 10,	The Applicant has responded to the LCC's Relevant Representation comment in LCC-031 within the Relevant Representation Report [REP1-074] submitted at Deadline 1. Commitment to a Public Archaeology and Engagement Strategy has been added to the Environmental Mitigation and Commitments Register [REP1-057] (refer to Table 2-1, section CH4)

Reference	Topic	Matter Raised	Applicant's Response
		which states that public benefit and knowledge dissemination should be integrated into the delivery of solar farms. As stated in our Relevant Representation, the Council would welcome the inclusion of the PACES 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.	and the OAMMS [REP1-078] submitted at Deadline 1.
8.36		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) [APP-272].	The Applicant has responded to the LCC's Relevant Representation comment in LCC-032 within the Relevant Representation Report [REP1-074] submitted at Deadline 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 [REP1-057] (refer to Table 2-1, section CH4) and the OAMMS [REP1-078] submitted at Deadline 1.

Reference	Topic	Matter Raised	Applicant's Response
8.37		The archaeological works to date have been largely positive, with a high proportion of the assessments done to the required standards. The Council recognise and accept that it will not be possible to cover all eventualities or impacts but the work to date has covered much that can reasonably be established or anticipated from the quality of the data at hand. The Council look forward to working with the Applicant to further enhance the management and mitigation plan and creating an effective forward-looking and innovative programme of public archaeology and community engagement.	Noted. The comment from LCC is welcomed by the Applicant.
8.38		In view of the range of concerns noted above, the effects of the proposed development on archaeological interests are considered to be negative.	The Applicant considers that these impacts are accurately and proportionately presented in ES Chapter 8: Cultural Heritage [REP1-016] and have been considered as part of the Applicant's assessment of planning balance within the Planning Statement [APP-260].
8.39		We will continue to work with the Applicant's archaeological consultant as more detail is provided regarding site-specific developmental impacts, to ensure that reasonable and appropriate evaluation and mitigation are undertaken to adequately deal with the impacts on surviving archaeological remains across the Order Limits.	Noted. The comment from LCC is welcomed by the Applicant.

3.9. Soils, Agriculture and Land Use Impact

Table 3-9 Soils, Agriculture and Land Use

Reference	Topic	Matter Raised	Applicant's Response
9.1	The importance of agriculture and food production to Lincolnshire	The potential impacts of the Meridian Solar Farm Project proposal on BMV, and potential cumulative effects arising with other projects (both NSIP and TCPA) that are emerging/known about in Lincolnshire, are of significant concern to the Council. The Council will seek to protect high quality agricultural land in Lincolnshire (ALC grades 1, 2 and 3a) from development in accordance with its Energy Infrastructure Position Statement adopted 5 December 2023. This position statement acknowledges that Lincolnshire has a high proportion of BMV land, which is the basis for its prosperous agricultural industry. The Council will object to proposals on grades 1, 2 and 3a agricultural land.	The UK Government Food Security Report, 2024¹⁵, 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. 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 [REP1-014], it is estimated that cumulative solar projects in Lincolnshire, together with the Scheme, will account for approximately 3% of all agricultural land within

¹⁵ Defra (2024), *United Kingdom Food Security Report*. Available at: <https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2024> [Accessed 5 October 2026]

Reference	Topic	Matter Raised	Applicant's Response
			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.
9.2		Given the policy position on BMV land, it is a critical as part of the assessment of the application to ensure that the information presented in the ES on soil quality and ALC grading is robust and reliable. Additionally, it is a requirement that the submission comprehensively addresses the effects of the scheme in respect of the economic and other benefits of the land within the context of production at various levels to enable the SoS to make an informed decision in line with paragraphs 5.11.34 and 2.10.137 of NPS EN-1 and NPS EN-3, respectively.	NPS-EN1 paragraph 5.11.34 requires that 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. Similarly, NPS-EN3 paragraph 2.10.137 requires that the Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. The Secretary of State should ensure that the Applicant has put forward appropriate mitigation measures to minimise impacts on soils. The Applicant has provided appropriate detail to inform the Secretary of State. 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 [REP1-014].

Reference	Topic	Matter Raised	Applicant's Response
			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 [REP1-061], OOEMP [REP1-063] and ODEMP [REP1-065]. 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 [REP1-068], 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. 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, would not result in any loss of jobs. There may be some contractors who undertake

Reference	Topic	Matter Raised	Applicant's Response
			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. 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.
9.3	Analysis and critique of the submitted ALC surveys, methodologies and	Under the heading 'Land Quality', paragraphs 11 – 21, RAC's report at Appendix ii references the freely available information on land quality within the application area, citing Natural England's 2026 Predictive ALC Map for England, the Provisional Map of ALC published by Ordnance Survey, Natural England's map of the Likelihood of BMV	Published data was considered to aid understanding of the baseline. Sources used are presented within ES Chapter 5: Agriculture and Soils [REP1-014]. They informed preparation for field surveys. The 2026 predictive model of ALC was not available at this stage, The predictive model of ALC is more nuanced than the provisional ALC map, identifying some

Reference	Topic	Matter Raised	Applicant's Response
	interpretation of results	Agricultural Land – Strategic Scale map for the East Midlands, DEFRA's Predictive Agricultural Land Classification Map for England (2026), as well as detailed soil survey carried out by MAFF in 1991 on a small part of the site. Collectively, these sources consistently indicate that the Meridian Solar Farm Project falls within an area that is mapped at grades 1 and 2 ALC, and where the likelihood of land being BMV is high.	Subgrade 3a within Grades 1 and 2 land of the provisional ALC map. Whilst the model and other mapping is extremely valuable for high-level locational planning of projects, neither provisional nor predictive ALC mapping is at a resolution to enable reliable data at the field scale, which is implicit in Natural England's requirement that field survey is undertaken. The field survey data were derived at a higher spatial resolution than the cited materials and derived from direct examination of materials, providing higher value data than the published materials. The survey data concluded that the Site comprises a mix of Grade 1, 2, 3a and 3b ALC land. Predictive ALC mapping assumes effective under-drainage of soils, which then allows the land to achieve BMV status. Survey evidence, however, indicates that soil wetness was the limiting factor in some areas. For example, root channels into lower soil layers were not observed. The functioning of tile drains, whether perforated plastic or clay, diminishes over time. Tile drains are used in tandem with unlined mole drains that deteriorate through collapse and silting. Differences between modelled outputs, historical records and the survey would be expected if under-drainage was not delivering to its full potential.

Reference	Topic	Matter Raised	Applicant's Response
			ES Chapter 5: Agriculture and Soils [REP1-014] referenced the nationally recognised soil mapping datasets alongside published geological information from the BGS. The soils identified during the survey were consistent with the mapped Wallasea 2 Association and with the published superficial geological deposits. Soil logs for the detailed survey of 1991 were not available, only the mapped outputs. 1991 survey only covered a small section of the Site within Land Parcel B. The area has subsequently been disturbed by the construction of the A16. A discussion of the 1991 survey results is presented within ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C [REP1-030].
9.4		The detailed survey carried out for the ES and included at Chapter 5 of the ES [APP-056] identified the following ALC grade split: 95.2ha of Grade 1 (8.9%); 77.4ha of Grade 2 (7.2%); 202.8ha of Subgrade 3a (19%) and 566.5ha of Subgrade 3b (53.1%). Following a second assessment, further to comments from Natural England on the methodology employed, a second analysis suggests the grade distributions are: 120.6ha of Grade 1 (11.3%); 92.6ha of Grade 2 (8.7%); 205.4ha of	The field average analysis reflected a form of assessment compliant with the methodology for ALC assessment. Droughtiness, within ALC assessment models, requires a moisture balance adjusted for two standard reference crops: winter wheat and maincrop potatoes. The field average analysis applied an assessment based on a field average measure of soil type (because crops are grown at the field scale). Subsequently, Natural England requested that assessment was made on individual auger points and a new analysis was prepared. For continuity and

Reference	Topic	Matter Raised	Applicant's Response
		Subgrade 3a (19.2%) and 523.7ha of Subgrade 3b (49.1%) land.	transparency both analyses were retained but ES Chapter 5: Agriculture and Soils [REP1-014] establishes that assessment was conducted on worst-case outcomes, i.e. on auger by auger point data analysis.
9.5		Analysis of the observations made to inform the ALC survey (and thus the conclusions drawn for use in the assessment as part of the ES) clearly indicate that they are significantly different from any previously published assessment of land quality of the proposed development area and surrounding area. Notably, and importantly, the Applicant has identified significant areas of ALC grade 3b (non BMV) land across large areas of land within the survey boundary, making up nearly 50% of the surveyed area. This is a difference which is not commented on or justified in the ES.	The ALC survey reported in ES Chapter 5: Agriculture and Soils [REP1-014] was conducted in 2025 and provides assessment of current conditions. A separate reconnaissance scale survey undertaken by Land Research Associates in 2024 also identified Subgrade 3b land. This is further referenced within ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030]. In summary, the survey data for the Scheme supersedes the historical data and data at a lower resolution that LCC are referencing.
9.6		In noting the large discrepancy in the BMV/non-BMV split between the survey results and the raft of previously published information available, RAC have undertaken a detailed review of the ALC methodology, the results and their interpretation and, as part of the Council's Relevant Representation [RR-111], a series of seven questions and queries were posed to the applicant for response. The Council notes that Natural	Applicant's detailed responses to the comments raised have been provided within Table 2-3 of the Relevant Representation Report [REP1-074], including to the seven points raised by RAC. Subsequent engagement on the ALC survey has been undertaken and a joint meeting to discuss the ALC survey results was held on 14 August 2026 and attended by LCC, RAC and Natural England. The Applicant will continue tracking engagement on these

Reference	Topic	Matter Raised	Applicant's Response
		England, in their Relevant Representation [RR-140], have stated that they also have major concerns regarding the accuracy of the presented ALC grades as a result of the survey undertaken, highlighting a number of common issues identified by RAC. The concerns span a range of matters but include: lack of reference to more detailed published soils information and previous surveys; incorrectly using a field-average approach when mapping ALC grade contrary to prescribed ALC methodology; queries over the extent to which calcareousness was tested and recorded; robustness of recorded logs; drainage status and Wetness Class characterisation; queries over identified of a Slowly Permeable Layer (SPL); limited number of soil pits not prepared to the required standard and not of sufficient quality to substantiate conclusions on soil characteristics.	mattes through the Statement of Common Ground with Lincolnshire County Council [REP1-082].
9.7		It should be noted that there are ongoing and live discussions between the Applicant, the Council and Natural England to discuss these matters in more detail and attempt to seek some level of agreement. As part of that engagement, there has been more information provided by the Applicant to the Council and Natural England to substantiate their position, which we understand will be submitted into the Examination at the earliest possibility for	Further to the point at 9.6 above, responses have been provided within Table 2-2 of the Relevant Representation Report [REP1-074] and engagement on these matters continues, as set out within the Statement of Common Ground with Lincolnshire County Council [REP1-082].

Reference	Topic	Matter Raised	Applicant's Response
		review by the ExA. In the RAC report attached, there is, for example, reference to the original seven queries posed at the Relevant Representation stage by the Council, the Meridian team's response to those queries, and further comment from RAC on those responses (see Appendix 2 of the RAC report – Review of ALC Survey Issues). Additionally, at Appendix 3 of the RAC report, there is a critique of further information supplied by the Applicant in relation to soil pits, which was not part of the formal submission. Again, we anticipate this further information to form part of an early submission by the Applicant of supplementary material into the Examination.	
9.8		Notwithstanding however, at this point in time the Council maintains that there are considerable deficiencies in the manner in which the ALC surveys have been conducted, their analysis and interpretation and the conclusions that have been reached on the strength of the survey information presented. Any re-grading deemed necessary would have potential implications on the assessment of significance of effects. In a situation where the downgrading of mapped BMV land is critical to the weight given to soils and agriculture in the planning balance, the available evidence is considered	The Applicant notes that on the basis of ES Chapter 5: Agriculture and Soils [REP1-014] , if all land classified as Subgrade 3b was determined to be Subgrade 3a, there would be no change to the significance of effects reported. However, the data derived from the field survey should not be modified as they present the baseline for restoration. These matters are discussed in the Statement of Common Ground with Lincolnshire County Council [REP1-082] submitted at Deadline 1

Reference	Topic	Matter Raised	Applicant's Response
		insufficient to support the conclusions drawn in the ES that the majority of the area taken by the scheme is not BMV. The Council will continue to engage with the Applicant to try and seek resolution of the outstanding matters and it is expected that these issues will form part of a forthcoming SoCG.	and the Applicant will continue to engage with LCC on this matter.
9.9		To that end, whilst there remain fundamental concerns with the ALC survey information presented, the Council has necessarily restricted itself from making detailed comments about how the Applicant has used the ALC grading in its micro siting decisions for infrastructure across the site. This includes assessment of impacts based on the breakdown of scheme components and ALC grades affected, as referenced in Tables 5-12 and 5-13 of the ES Chapter 5 [APP-056]. Nevertheless, and without prejudice to the outcome of ongoing discussions with the Applicant, Natural England and the ExA, the Council notes (at paragraph 5.7.3 of the ES Chapter 5) the commitment to exclude any physical development and retain arable land within Habitat Management Area 6 (for skylark benefit) owing to the prevalence of grade 1 and grade 2 BMV land, which is positive. Similarly, avoiding woodland blocks as part of the landscape design to	The Applicant notes LCC's response and welcomes the positive comments made.

Reference	Topic	Matter Raised	Applicant's Response
		minimise negative impacts on BMV is also welcomed.	
9.10		The Council notes the Applicant's approach to assigning a worst case scenario, in terms of duration of effect, to the creation of hardstandings for the on-site substation, BESS compounds, Solar Stations and CSEC compounds, to classify those as 'permanent' impacts when coinciding with grades 1 and 2 land (paragraph 5.8.2). The Council would question whether, given the longevity of the development for at least 40 years, all BMV land, including 3a graded land, ought to be included in this same category. On the basis of the Applicant's (disputed) figures, this would have implications on significance of effect where permanent effects occur on grade 3a land (high sensitivity) over an area of between 5 – 20 ha (moderate (or medium) magnitude), this would equate to a moderate adverse effect (reference para 5.8.6 of Ch 5). Similarly, if areas have been under-graded, and more land falls into grade 1 and 2, then this would result in more extensive areas being subject to significant Major Adverse effects.	Whilst the ability to restore land to Subgrade 3a is more readily achieved than it is for Grades 1 and 2, it is acknowledged that it may take time to deliver a favourable outcome. The timeframe is likely to extend beyond the decommissioning phase for all BMV land. Consequently, in response to representations received by LCC and Natural England, the Applicant has considered permanent effects from hardstanding on Subgrade 3a land within ES Chapter 5: Agriculture and Soils [REP1-014] submitted at Deadline 1.
9.11		The Council would also question the summary table of effects 5-16 based on the Institute of Sustainability and Environmental Professionals	Table 5-16 has been updated so that the effects of hardstanding are treated as if permanent within ES Chapter 5: Agriculture and Soils [REP1-014] at

Reference	Topic	Matter Raised	Applicant's Response
		(ISEP) guidance – there are circumstances in this development where effects would apply across Very High Sensitivity land (Grades 1 and 2) combined with a Medium magnitude of Impact (permanent losses between 5 and 20 ha, where siting BESS, solar stations etc) results in Major adverse effects, which are not recorded in this table. Should any re-grading be deemed necessary (to address the Council's concerns on the ALC survey results) then this may have the effect of categorising more land as BMV, with further implications on the significance of effects.	Deadline 1. The consequence of this revision is to recognise the effect as a major adverse (significant) effect.
9.12	Commentary on productivity, economic output and related socio-economic issues	The current and historical use of the land proposed to be occupied by the scheme has not been described in great detail, other than it is ' <i>currently used to grow arable crops</i> '. RAC highlight in their report that this deficiency means that the ES cannot assess the economic contribution of crops grown in the scheme area to individual farm businesses affected, or the impact of the loss of production (through the removal of the land for agricultural purposes) on the local or regional economies. Furthermore, the lack of data on land use and cropping also renders it impossible to undertake any valid assessment of the cumulative impact of the proposal.	The Applicant's assessment of effects on agricultural land holdings in ES Chapter 14: Socio-Economics and Land Use [APP-065] is receptor-based. It considers the landowners and tenants affected, the sensitivity of their holdings, and the potential for the Scheme to compromise the viability of the holding. Economic impacts are assessed in terms of employment, through consideration of the jobs supported by on-site uses and the application of multipliers to account for the indirect and induced employment within the supply chain. This is a more robust approach to assessing effects on agricultural landholdings and the economy than one which depends on the type and value of individual crops currently produced on the

Reference	Topic	Matter Raised	Applicant's Response
			land. This approach has been used for numerous other DCO applications and is considered proportionate. The baseline records that the Site is predominantly agricultural land, mainly arable with some grazing, and that the Solar Development Areas are farmed by five landowners with no tenant farmers. The Applicant considers this sufficient to reach a reasoned conclusion on likely significant effects relating to agricultural landholdings and employment, and that a more detailed crop-by-crop baseline would not alter the conclusions of the assessment. Further justification of the approach is set out in the Applicant's responses to the matters raised below. Separately, however, the Applicant has provided crop information for the Solar Development Area within Appendix A of this document.
9.13		In the absence of any cropping details for the scheme area, RAC have put together an estimate of typical cropping for the immediate area using cropping data from the Rural Payment Agency's Crop Map of England (CROME) for years 2021 – 2025. This shows that cropping of the area is mixed, comprising a range of crops including cereals, cover crops, peas and beans, oilseeds, maize, sugar beet,	RAC's estimate of £1,431,000 to £1,904,000 per annum gross agricultural output indicates the revenue which could be raised by the crops if they were sold. It is not accurate to state that this is the value which would go into the local economy. Gross output does not reflect the costs of production (including fuel, fertiliser, seed and machinery), and a substantial proportion of spending on these items would go

Reference	Topic	Matter Raised	Applicant's Response
		potatoes, onions and brassicas. Based on this, the potential agricultural output achievable from this range and area of cropping across 1,064ha of proposed development area is estimated to be between £1,431,000 and £1,904,000 annually, equivalent to a per hectare average annual output of between £1,345 and £1,789. Over the minimum 40 year lifespan of the development, this equates to somewhere between £57.24 million and £76.16 million lost to the local economy, excluding any added value within the supply chain.	outside the local area. While some of the crops may be sold and consumed locally, it is likely that much the produce will be transported outside of Lincolnshire to retailers and wholesalers based elsewhere in the country. The sum of £57.24 million to £76.16 million is similarly not a robust representation of the net economic effect on the local economy. ES Chapter 14: Socio-Economics and Land Use [APP-065] considers economic effects in terms of employment on a net basis, adopting a robust and proportionate approach. The RAC figures also do not take account of the c. 160 ha of land within the Solar Development Areas that will be retained in arable use, or of the diversified rental income that landowners will receive from hosting the Scheme, which offsets the change in farming income. All landowners within the Solar Development Areas have entered into voluntary agreements with the Applicant, and there are no tenant farmers within these areas. On employment, the ES concludes that any loss of agricultural sector employment is likely to be minimal, given that the Solar Development Areas are farmed by the landowners themselves and that any contractors involved are not wholly reliant on the land. The Scheme is estimated to generate a net gain of 11 FTE jobs during operation.

Reference	Topic	Matter Raised	Applicant's Response
			On this basis, the ES concludes that the effect on agricultural land holdings within the Solar Development Areas is minor beneficial (not significant), and that the effect on the local economy from employment is negligible (not significant).
9.14		When compared to the rest of the county, where average annual economic output per hectare is between £1,096 and £1,459, the economic output per hectare attributable to agriculture on the proposed development area is about 23% greater than that averaged across the county. These estimates of economic output, and in particular the heightened difference in productivity for this part of Lincolnshire where there is higher likelihood of BMV, have not been taken into account in the ES.	The Applicant notes RAC's comparison of the estimated output per hectare with the county average. As set out in the Applicant's response to 9.13 above, the figures referred to represent gross agricultural output, which is not in itself a measure of net economic effect, and the assessment in ES Chapter 14: Socio-Economics and Land Use [APP-065] considers effects on a net basis. Notwithstanding the above, the Applicant has provided crop information for the Solar Development Area within Appendix A of this document. That information demonstrates that in 2025 a quarter of the land was diverted to environmental schemes and not producing any crops, and that cropping was otherwise dominated by cereals rather than higher value vegetables. Available information indicates that the end market for cereals was animal fodder and energy use, and that the crops supplied for human consumption were limited.

Reference	Topic	Matter Raised	Applicant's Response
9.15		In terms of socio-economic impacts, the report from RAC highlights that social impacts such as employment, including indirect impacts on associated agricultural businesses such as machinery dealers, seed and fertiliser merchants, transport, packing and processing, cannot reasonably be estimated without detailed knowledge of the business(es). In this regard, and in the absence of specific details, Chapter 14 of the ES (Socio-Economics and Land Use) [APP-065] fails to take fully into account guidance on the essential components of Environmental Assessments and Reports as referred to the guidance issued by the Institute of Sustainability and Environmental Professionals (ISEP).	As outlined within ES Chapter 14: Socio-Economics and Land Use [APP-065], the likely impacts on agricultural employment have been considered within the assessment of net employment effects during operation. Indirect impacts on businesses in the supply chain are covered through the application of multipliers. The Solar Development Area is farmed by the landowners and there are no tenant farmers, so there is no displacement of tenants. The landowners will continue to generate income from their land during construction and operation of the Scheme. There may be some contractors who undertake farming activities on the land, but it is very likely that such contractors would not be entirely reliant on these farms for employment. Any loss of agricultural employment is therefore likely to be minimal. Within the Grid Connection Route and Inter-Array Connections, disruption to farming activities would largely be temporary and short term. A more detailed assessment of indirect effects on the agricultural supply chain would require further research and / or consultation, which would not be proportionate. 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

Reference	Topic	Matter Raised	Applicant's Response
			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.
9.16		The Applicant's assessment of impacts on temporary and permanent elements of agricultural business is questioned since the ES fails to take into account the nature and extent of affected holdings and the impacts each business will experience, including the cropping and rotational areas that will be lost. Similarly, the ES fails to take into account any impact on employment caused by the withdrawal of the land from production or the knock-on impacts any losses may have on local services such as shops, schools and tradesmen.	The Applicant's response to 9.15 above sets out the assessment of effects on agricultural employment and the wider agricultural supply chain, and applies equally to this comment. As no material loss of agricultural employment is anticipated, the Applicant does not expect knock-on effects on local services such as shops, schools and tradesmen.
9.17		The removal of a significant area of land from agricultural production arising from the development is likely to have impacts extending well beyond the farm boundary. The well-developed inter-relationships between land and communities in Lincolnshire is complex and extensive, and understanding the impact of removal of land from production requires close consultation with affected farm businesses. In the Council's view the ES fails to examine these impacts in any meaningful way and	The Applicant has considered the socio-economic effects of the Scheme on agriculture in ES Chapter 14: Socio-Economics and Land Use [APP-065], and its responses to the matters raised above set out the basis for its conclusions. In summary, the Solar Development Area is farmed by the landowners, who have entered into voluntary agreements with the Applicant and will receive diversified income from the Scheme, and there are no tenant farmers in these areas. No material loss of agricultural employment is

Reference	Topic	Matter Raised	Applicant's Response
		therefore this undermines the ability to take into account the economic and other benefits of that land, as is required by national policy as set out in NPS EN-1 and EN-3 when assessing such proposals.	anticipated, and the Scheme is estimated to generate a net gain of 11 FTE jobs during operation. Effects along the Grid Connection Route and Inter-Array Connections are temporary, with land reinstated in accordance with the OSMP [REP1-068]. The figures for agricultural output put forward by RAC represent assumed gross output and are not in themselves a measure of net economic effect. The Applicant considers that this assessment meets the requirements of NPS EN-1 and NPS EN-3. Paragraph 5.13.2 of EN-1 requires applicants to include in the ES an assessment of likely local or regional socio-economic impacts, and paragraph 5.13.4 sets out the matters that assessment may consider, including employment and indirect effects on the region, which ES Chapter 14 [APP-065] addresses. Paragraphs 4.2.13 and 4.3.10 of EN-1 provide that the ES should be proportionate and focused, with sufficient detail to identify the likely significant effects, and the Applicant considers that ES Chapter 14 [APP-065] provides this. In respect of agricultural land, paragraph 5.11.34 of EN-1 and paragraphs 2.10.21 to 2.10.23 of EN-3 require applicants to justify the use of agricultural land, in particular Best and Most Versatile (BMV) land, and paragraph 2.10.26 of EN-3 encourages the use of a

Reference	Topic	Matter Raised	Applicant's Response
			soil management plan, which the Applicant has secured through the OSMP [REP1-068]. Paragraph 2.10.137 of EN-3 and paragraph 5.11.34 of EN-1 direct the Secretary of State to take into account the economic and other benefits of BMV land. The information for this purpose is provided in ES Chapter 5: Agriculture and Soils [REP1-014] and ES Chapter 14: Socio-Economics and Land Use [APP-065].
9.18	Other matters (Cumulative effects; potential grazing; drainage and irrigation; Outline Soil Management Plan; soil health)	As with the other NSIP solar schemes that have been proposed in Lincolnshire, the Council continues to challenge the use of the word 'temporary' to developments of this nature spanning at least 40 years (with some of those other NSIP schemes spanning 60 years), particularly where the direct impact is the removal of land from existing agricultural systems, with consequential knock-on socio-economic impacts as described in this section.	The Scheme does not sterilise the land for future agricultural use and hence use of the term long-term temporary and reversible are applicable terms. 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.

Reference	Topic	Matter Raised	Applicant's Response
			The potential socio-economic impact is discussed in the sections above.
9.19		The Council would disagree with the statement that the cumulative effects are not significant. If reference is made again to DESNZ Renewable Energy Planning Database, they clearly show a disproportionate and rapid growth in energy infrastructure in the county compared to the rest of the country, with the areas of planning permissions and consents rising by 19.5%, compared with 13% nationally. Over the same period, Lincolnshire accounts for roughly 29% of all new nationally granted solar area, despite only having approximately 5% of UK agricultural land. This situation is compounded by the fact that much of the affected land is high quality BMV.	Additive impacts are acknowledged and presented within ES Chapter 5: Agriculture and Soils [REP1-014]. As set out within Section 5.11 of ES Chapter 5: Agriculture and Soils [REP1-014], 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. Data presented on the relative contribution within Lincolnshire to the UK energy transition reflect land use preferences of individual landowners, availability of grid connection points within the area and the feasibility to use this land for solar development. No evidence was identified for consequential cumulative effects to soils and agricultural land.
9.20		In the context of a national policy direction that is intended to preferentially locate such developments on brownfield, contaminated or industrial land, or, if it has to be located on agricultural land, then lower	The use of alternative locations for solar development, including rooftops and brownfield land, has been considered within the Planning Statement [APP-260]. Rooftop solar is an important part of the

Reference	Topic	Matter Raised	Applicant's Response
		quality land, the cumulative effects of these projects on agricultural land is considered by the Council to be significant, with those impacts extending to the wider agricultural economic base of the county. It is notable that the ES also fails to assess any cumulative effects relating to the use of land and its productivity, specifically in terms of its contribution to the local and regional economies.	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. 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. The potential socio-economic impact is discussed in the sections above.
9.21		If Lincolnshire is cumulatively contributing around 3% of its agricultural land to solar projects, then this is, proportionately, significantly higher than that identified in the LUF, which estimates that the	Please refer to response to 9.19.

Reference	Topic	Matter Raised	Applicant's Response
		approximate area of agricultural land to be used for solar and wind energy by 2035 will be about 1% (or 1.8% of its Utilised Agricultural Area) in England.	
9.22		The ES suggests that grazing by sheep could maintain agricultural production. It is noteworthy that sheep cannot graze on weeds arising from cessation of intensive arable production therefore the land would have to be purposely sown with grassland before construction with enough time for proper establishment to provide resilience to traffic between arrays. This is a complication not considered as part of the assessment.	Habitat management will not allow arable weeds to dominate land within the Scheme. Land management responsibilities are secured through the OLEMP [REP1-070]. This includes converting areas of agricultural land around and beneath the solar PV panels into species rich grassland. It is also noted that ES Chapter 5: Agriculture and Soils [REP1-014] does not rely on grazing as a mitigation measure to reduce effects identified, as the use of grazing across the Solar Development Area is dependent on the availability of grazers at the time of operation.
9.23		Land drainage is a key factor in assessing both land classification and the impact on land restoration. This is particularly important along any cable or grid connection route, where trenches are dug, or even where soils are stripped even temporarily, where there is the possibility that important below-ground land drainage infrastructure could be adversely impacted, having a significant effect on agricultural operations. Drainage and other existing underground infrastructure are critical elements of effective agricultural land management in the Fens, most of which have cover of around 0.75m. The ES	Impacts on land drainage are considered within ES Chapter 11: Hydrology and Flood Risk [REP1-020]. In addition, the OCEMP [REP1-061] sets out a series of measures to ensure existing field drainage functionality is maintained during and after construction. These include: Ensuring existing field drainage systems are not compromised as a result of construction, with drainage maintained during the works and reinstated, so far as

Reference	Topic	Matter Raised	Applicant's Response
		does not fully account for the possible disruption of this infrastructure during installation and decommissioning. Whilst there is reference to maintaining field drainage functionality in the oCEMP[APP-275], the commitment to maintaining or reinstating existing drainage infrastructure is caveated by the use of the words 'as far as reasonably practicable'. Given the importance of drainage in this area then this needs to be strengthened to ensure existing drainage systems are not compromised in any way whatsoever as a result of the development at all stages. On a related matter, the Council notes that the Environment Agency has raised concerns in their Relevant Representation [RR-047] over the need to include a maintenance schedule for field drainage systems, which we would support.	reasonably practicable, to a condition that is as effective as before; • 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 • 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. The ODEMP [REP1-065] sets out that: • The drainage of the land within the Scheme will be checked and grassed after decommissioning. Should any agricultural drains be altered or removed, they will be restored such that agricultural activities could continue after decommissioning of the Scheme. • Drainage systems will be monitored throughout decommissioning.

Reference	Topic	Matter Raised	Applicant's Response
			With these measures in place, no significant adverse long-term effects on land drainage capacity or agricultural productivity are anticipated. In response to the EA's concern in their relevant representation, the OCEMP [REP1-061], OOEMP [REP1-063] and the Environmental Mitigation and Commitments Register [REP1-057] have been updated to refer to a programme of maintenance and inspection being implemented for on-site drainage. There is a commitment within the OSMP [REP1-068] to surveying the route post consent once the proposed alignment of the 400kV overhead line is confirmed. At that stage, investigation would include identification of field drainage and the strategy for maintaining functionality established within the relevant detailed management plans.
9.24		Also, land that currently benefits from irrigation is not identified. Irrigation enables the full versatility of land to be utilised including the production of high value crops such as potatoes, sugar beet and brassicas. Any extended interruption to the use of an irrigation abstraction licence is likely to result in that licence being revoked permanently, and unlikely to be re-issued at decommissioning, thereby limiting the use of land post-development	Cropping information has been reviewed for the Solar Development Area and is provided within Appendix A of this document. High value crops such as potatoes and sugar beet account for a limited area. Most land is farmed for biodigested energy crops and animal feed not requiring irrigation. The Applicant acknowledges that continuation, variation or surrender of abstraction licences is regulated by the Environment Agency and will be

Reference	Topic	Matter Raised	Applicant's Response
		to crops not reliant on irrigation. This means land currently benefitting from irrigation will be less productive on decommissioning compared to the existing situation. This is a factor that does not appear to have been accounted for in the assessment of likely permanent impacts.	managed through the relevant regulatory processes where applicable, but the current cropping means that it is not a material consideration. Furthermore, the Applicant's Water Supply Strategy (Doc Ref. 8.37) submitted at Deadline 2 notes that license trading could be an option for the provision of water supply for the Scheme. Limited and short-term disturbance would occur within the Inter-Array Connections and Grid Connection Route, and therefore, no significant effect on abstraction licenses, if used within these areas, is considered likely.
9.25		An Outline Soil Management Plan (oSMP) has been provided by the Applicant. It is largely generic in nature. The baseline soils data used in the oSMP are based on the ALC survey presented with the application, the results from which are questioned by RAC in their report. Detailed surveys of soil type, structure and health should be carried out to form a robust baseline, against which restoration and aftercare can be assessed, to accurately inform the final Soil Management Plan (SMP).	The results of ALC surveys are reported within ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] and summarised in ES Chapter 5: Agriculture and Soils [REP1-014]. These documents provide the baseline data for soil management planning. The survey appendices and chapter were updated at Deadline 1 to respond to relevant representations made by LCC and its specialist subject advisor (RAC). The Applicant considers that the surveys completed are robust and that a further post-consent survey may not resolve the disagreement of the ALC survey results.

Reference	Topic	Matter Raised	Applicant's Response
			The detailed Soil Management Plan will be developed using all of the existing data available, with information supplemented for areas where surveys are yet to be undertaken. The detailed plan will be developed in substantial accordance with the OSMP [REP1-068].
9.26		The oSMP states that land restoration after decommissioning will aim to restore all agricultural land without diminution of original ALC grades, but this statement is undermined given that there is a lack of confidence in the results and mapping from the ALC survey itself.	The Applicant's response is set out under 9.25 above.
9.27		Other deficiencies in the oSMP include a failure to include any details on nature and duration of aftercare, omission to consider mass balance of soil types stripped from area of temporary landtake and appropriate storage in the consideration of soil movement and storage from construction through operation, to decommissioning.	Soil budgets and soil storage locations will be developed within the detailed Soil Management Plan in conjunction or by the appointed contractor and in accordance with the principles established within the OSMP [REP1-068]. Aftercare is addressed within Section 5.7 of OSMP [REP1-068] by a commitment to specialist advice to the landowner, post decommissioning, from specialists, drawn from agronomists, soil scientists and/or agricultural engineers.
9.28		The scheme is defined as temporary, and the ES fails to include any assessment of any changes that	ES Chapter 5: Agriculture and Soils [REP1-014] establishes that the absence of cultivation and

Reference	Topic	Matter Raised	Applicant's Response
		are likely to be experienced during the life of the development. For example, no evidence is provided in terms of potential changes in the soil health of land taken out of production and subject to reduced solar inputs for an extended period. In its current form, there is no proposal for the establishment of any baseline condition assessments of soil health in order that any future changes can be assessed at a later stage.	establishment of a permanent herb-rich grass sward is projected to improve soil structure and carbon sequestration. Applying ISEP guidance ¹⁶ these improvements to soil resources could have been interpreted as a moderate benefit. However, on a precautionary basis, the assessment has been moderated to present a minor beneficial effect (not significant).
9.29		Whilst there is some evidence that short term fallowing if intensively farmed arable land has a generally positive effect on soil health, there is little research into the long-term removal of highly productive land from agriculture. RAC's report (paragraph 59) refers to a long-term experiment at Rothamsted's Research station and potential reductions in soil carbon, nitrogen and soil structure over 50 years of bare-fallow management. There are also uncertainties regarding the effects of permanent shade and differential wetting on plant communities and soil structure and health beneath solar PV panels. In the absence of definitive	The Scheme will not result in bare fallow areas. The establishment of herb-rich grassland is proposed and as noted in 9.28 above is projected to provide benefits to the soil.

¹⁶ ISEP (2022) *A New Perspective on Land and Soils in Environmental Impact Assessment*. Available at: https://www.iema.net/media/3xejdu0u/2022-iema_land_and_soils_guidance.pdf.

Reference	Topic	Matter Raised	Applicant's Response
		evidence of long-term solar PV placement being beneficial to these high-quality soils, it is reasonable to seek to retain them for agricultural production.	
9.30	Conclusion	In summary, should the development go ahead, there would be a significant loss of BMV land, with consequential negative impacts on economic and other benefits. The vast majority of the site area is currently productive, high-quality farmland, which would be removed from mainly arable farming for at least 40 years, and replaced with, at best, a lower intensity grass-based system. The loss of arable production is considered locally significant and in view of other projects in the wider district and county, potentially cumulative significant adverse effects may arise. When reference is made to the LUF, which suggests that about 1% of land nationally (and about 1.8% of its Utilised Agricultural Area) will be used for solar and wind energy by 2035 (equivalent to 155,000 ha), it is the Council's view that the county of Lincolnshire, which has more agricultural output than any other county, has already met its committed relative proportion of solar development through successive NSIP-scale and other applications of this nature and is therefore disproportionately contributing to this national objective.	The Applicant disagrees with the statement that BMV land would be lost. Areas of BMV land under hardstanding, to be restored upon decommissioning, have been assessed as permanent land use change because of uncertainty over the timeframe to restoration. However, the OSMP [REP1-068] establishes measures to restore land, other than permanent land use change for the establishment of trees and hedges along field boundaries. Whilst this utilises BMV land, the approach has been recognised as positive in respect of other ecosystem services, including productivity of the adjacent agricultural land. Notwithstanding the above, ES Chapter 5: Agriculture and Soils [REP1-014] recognises that the Scheme will have a moderate adverse (significant) effect on agricultural land, due to the long-term restriction of Grade 1 and 2 agricultural land use, and a major adverse (significant) effect as a result of the assumed downgrading of Grade 1 and 2 areas, where this is used for hardstanding during the operational phase. However, these effects would need to be considered

Reference	Topic	Matter Raised	Applicant's Response
			within the context of the benefits of the Scheme, as described within the Planning Statement [APP-260]. A response to the cumulative effects is provided in the sections above for comments 9.1 and 9.19.
9.31		At such a critical time in the delivery of solar energy, the Council considers it imperative that proposals should be fully justified in terms of the prevailing policy environment in respect of BMV. In this case, the Council considers that there are serious reservations over the ALC grading submitted in support of the application, particularly the mapping of almost half the land as grade 3b (non-BMV). In the absence of robust evidence to substantiate the grading applied to these areas and no clear explanation as to why the Applicant's survey results differ so significantly from the many separate sources that indicate to the contrary, it is the Council's view that a precautionary approach needs to be taken in respect of the extent of BMV land within the site area. On applying the Rochdale Envelope approach, as the Applicant has done with the grid connection corridor (relying on the various provisional maps which indicate grades 1 and 2), the Council considers that all the land falling within the	Additional information has been provided as part of the updated ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D [REP1-028] and ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C [REP1-030] to provide further evidence to substantiate the findings of these surveys, as requested by LCC in their relevant representation. Detailed responses to the relevant representation are found within the Relevant Representation Report [REP1-074] submitted at Deadline 1. The Applicant will continue to engage with the LCC, Natural England and other stakeholders throughout the Examination, including through Statements of Common Ground where relevant, to resolve these queries on the survey results. The data presented within ES Chapter 5: Agriculture and Soils [REP1-014] demonstrate that all significant effects on agricultural land are captured irrespective of whether Grade 3 land were classed as Subgrade 3b land or Subgrade 3a. However, the data derived from

Reference	Topic	Matter Raised	Applicant's Response
		site should be viewed as BMV, unless and until such time that firm evidence is provided to the contrary.	the field survey should not be modified as they present the baseline for restoration.
9.32		Notwithstanding the Council's significant concerns with the survey and grading, on the basis of the ALC results submitted there has been little attempt to avoid the use of BMV land and a failure to justify any exception for its use, as well as a failure to take account of and assess the economic or other benefits of the BMV land. In conclusion, the impact of the development on BMV and soil resources is contrary to national policies NPS EN-1 and EN-3 and Local Plan policies.	Discussion around the avoidance of BMV land is discussed in response 9.18 above in this table. Discussion around the economic impacts of the Scheme are discussed in responses 9.12 to 9.17 above in this table.
9.33		On this basis, the Council concludes that the proposal would have a negative impact on soils, agriculture and land use.	The conclusion of LCC is noted. Please refer to the foregoing responses.

3.10. Socioeconomics

Table 3-10: Socioeconomics

Reference	Topic	Matter Raised	Applicant's Response
10.1	Temporary Workforce	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.	There are a number of urban settlements within the 60-minute travel area that contain large (50+ room) establishments, including (but not limited to) Peterborough, Grantham, Boston, Wellingborough, Huntingdon, and St Neots. As outlined within

Reference	Topic	Matter Raised	Applicant's Response
		It is likely that, given the intention to focus accommodation in large establishments with 50+ rooms, this 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.	OCTMP [REP1-067], 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.
10.2		While it is appreciated that the 60-minute drive time that is used to identify the travel to work area (paragraph 14.4.3) 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 and accommodation availability. As already stated, the Lincolnshire highway network is made up of predominantly single carriageway roads with a slower average travel speed, and a high proportion of slow-moving freight and farm traffic. The 60-minute travel time is, therefore, nearer to 35-40 miles than the 50 miles that appears to be assumed. This is especially the case during the AM and PM peaks. This smaller travel to work area will impact the amount of overnight accommodation for the temporary workforce and thus compound our concerns	The assessment does not at any point assume a 50 mile travel to work area. A 60-minute drive time (Wednesday 09:30) has been used for the worker accommodation assessment and is mapped based on GIS data in ES Figure 14-7: 60-Minute Drive Time from the Site [APP-158]. This approach reflects that travel speeds vary on different roads, which using a straight-line radius would not reflect. The comment regarding the assessment for the Fosse Green NSIP project is noted. However, the Applicant has taken an assessment which is bespoke to this Scheme and which uses more up-to-date data on hotel capacity, and so the findings of this assessment are more valid in this instance.

Reference	Topic	Matter Raised	Applicant's Response
		regarding capacity of accommodation and potential impacts that may arise due to a shortage of overnight accommodation for tourists wishing to stay overnight. Research undertaken for other NSIP projects (Fosse Green) identifies that January, February and March are the months with the highest capacity to accommodate the temporary workforce. The other months of the year do not. While the study area varies for each NSIP, given the degree of overlap of the 60-minute travel to work areas, we do not consider that the overall picture of accommodation availability would be any different for this application.	
10.3	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 Lincolnshire as a tourist destination and somewhere to visit. The proposed Weston Marsh substation that this application is proposed to connect to will also (assuming approvals are given) have overhead pylons connecting into and out as a part of the National Grid Grimsby to Walpole scheme. As a result of these projects, there will be a significant increase in pylons and overhead cables in and around Weston Marsh. In particular, our concerns relate to impacts on Springfields Gardens	Within ES Chapter 14: Socio-Economics and Land Use [APP-065], direct effects through land take and indirect effects through severance on tourist attraction, including Springfield Gardens and the Baytree Garden Centre and Owl Centre, are assessed, and found to be not significant. The Cumulative Effects Assessment presented in Section 14.11 of ES Chapter 14: Socio-Economics and Land Use [APP-065], assessed the potential for cumulative effects with Grimsby to Walpole scheme. The Preliminary Impact Report for the Grimsby to Walpole Scheme finds that no effects larger than negligible are anticipated on the businesses of either Baytree

Reference	Topic	Matter Raised	Applicant's Response
		and the Baytree Garden Centre and Owl Centre, where visitors would have direct views of these new pylons and cables, especially from the A16 which is also elevated as it passes close to the Weston Marsh site.	Garden Centre and Owl Centre or Springfields Gardens and as such, no significant cumulative effects on these receptors are anticipated. Further 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 is likely to experience a significant visual effect during construction, operation and decommissioning works due to the visibility of the Grid Connection Route, and is not likely to experience any significant noise and vibration effects. Springfields Gardens is not likely to experience significant visual or noise effects. Cumulative landscape and visual effects with other developments are set out within ES Appendix 12-7: Landscape and Visual Cumulative Assessment [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, when the totality of the change in the landscape is considered with the Scheme and all of the cumulative schemes together, it

Reference	Topic	Matter Raised	Applicant's Response
			is concluded that there will be significant effects on visual receptors in the vicinity of the Scheme. No significant cumulative noise effects from overhead line infrastructure have been identified within ES Chapter 13: Noise and Vibration [APP-064].
10.4	Visitor Economy and Economic Impact	The Council is extremely concerned about the potential 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 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 would be disrupted by developments such as the one proposed here. The impacts of views and the landscape are commented on later in these comments.	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

Reference	Topic	Matter Raised	Applicant's Response
			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, where practicable, whilst retaining long-distance views through designed gaps in planting.
10.5	Cumulative effects	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.	A cumulative effects assessment has been included within ES Chapter 14: Socio-Economics and Land Use [APP-065]. The assessment acknowledges that a number of developments within Lincolnshire are ongoing and all individually have the potential to impact socio-economic receptors including tourism, communities, residents, and businesses. However, the assessment finds that, based on the limited effects of the relevant nearby developments, including the Scheme, these socio-economic receptors would not experience a significant cumulative effect as a result of these developments.
10.6		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	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

Reference	Topic	Matter Raised	Applicant's Response
		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. 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.	judgement and precedent from comparable schemes. 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 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. The 30km Zol applied to solar and electrical infrastructure NSIPs for the purposes of the accommodation assessment reflects a reasonable worst case scenario. 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 Zol. It should be noted that, as set out in ES Chapter 14: Socio-Economics and Land Use [APP-065], the sum

Reference	Topic	Matter Raised	Applicant's Response
			of the total peak staff for each NSIP included within the assessment has been used, but in reality, it is unlikely that all projects will have the same construction schedule, and it is probable that the peak workforces of all projects will not 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 Solar and electrical infrastructure NSIPs which are not included within the supply. It should also be noted that only hotels with over 50 rooms and classed as either 'economy' or 'midscale' have been included within the supply (smaller and 'upscale' hotels have been excluded), and Air BnB and private rental accommodation have been excluded. Therefore, the approach taken is considered to represent a reasonable worst-case scenario, and to be proportionate. With specific regard to Springwell Solar, this scheme is located approximately 34km from the Scheme, outside the 30km Zol applied within the accommodation assessment.
10.7		The cumulative impacts of schemes on the Weston Marsh area also needs to be fully considered. The	Refer to response to 10.3. The Applicant considers that the ES provides a robust assessment of the

Reference	Topic	Matter Raised	Applicant's Response
		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. The inter-cumulative impacts of these proposals do not appear to be sufficiently analysed or mitigated in this or, potentially, other applications of this type, even when utilising the Government guidance within 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment'. Which encourages Applicants to use GIS software to adequately identify other developments; not to limit themselves and their search in terms of the type of proposed NSIPs and to properly consider the nature and capacity of the receiving environment.	cumulative effects in accordance with 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment'. Within this comment, the Applicant understands that LCC is referring to the consideration of cumulative overhead line infrastructure, which has been specifically considered within the cumulative effects assessments presented within ES Chapter 12: Landscape and Visual [APP-063] and ES Chapter 14: Socio-Economics and Land Use [APP-065], and the supporting figures and appendices.
10.8	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 Council acknowledge the reference in paragraph 14.9.2 to the Outline Skills, Supply Chain and Employment Plan. We recommend ongoing dialogue with local skills providers, both public and voluntary sector providers. These may include Lincoln College, Boston College and the LCC Employment and Skills team.	This comment is noted. The Outline Skills, Supply Chain and Employment Plan [REP1-072] 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 detailed Skills, Supply Chain, and Employment Plan, which will be developed prior to construction if the Scheme is granted development consent.

Reference	Topic	Matter Raised	Applicant's Response
		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.	
10.9		The Applicant should consider an approach that prepares the local labour market for the forthcoming opportunities. This could include: • Local provider engagement at an early opportunity. • Sector development support, to allow local supply chain to prepare existing workforce, and build and encourage opportunities to grow the workforce. • Bespoke activity that encourages our evidenced 'hard to reach' and opportunity potential workforce (over 50's, retired military etc) to access new skills and jobs. • Raising aspirations within the local communities: Evidence shows that low aspirations in the communities is a key blocker to accessing employment. Such an intense, high profile project can help raise aspirations in local communities by supporting local incentives and schemes. This will support the project by unblocking barriers to local	This comment is noted. The Outline Skills, Supply Chain and Employment Plan [REP1-072] provides a framework for maximising benefits for the local labour market including networking and collaborating with local partners and businesses, maximising the demographic diversity of the workforce, and engagement with local education and skills providers. These approaches will contribute to supporting local employment and the wider community as a whole. Further details of the approaches and commitments to securing these local benefits will be laid out within a detailed Skills, Supply Chain, and Employment Plan, which will be developed prior to construction if the Scheme is granted development consent.

Reference	Topic	Matter Raised	Applicant's Response
		people accessing employment. This will need to be funded activity by the developer.	
10.10		The Council welcomes the inclusion of requirement 20 in the draft DCO for submission and approval of a skills, supply chain and employment plan (SSCEP), which must be substantially in accordance with the framework (sic) skills, supply chain and employment plan [APP-283 – Outline Skills, Supply Chain and Employment Plan]. Given that skills and employment generation are relied upon as a key benefit from the scheme, as referred to in section 4.3 of the Planning Statement [APP-260], the Council would also recommend that an annual funding contribution of £50,000 (index linked) is provided for the lifetime of the development, to provide a funding mechanism by which the objectives of the SSCEP can delivered, through assisting in its implementation and supporting the initiatives identified. In Lincolnshire a similar contribution has been provided by way of a section 106 agreement in relation to the Heckington Fen Solar Farm and the Springwell Solar farm developments.	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 funded projects may focus on promoting economic development and therefore to delivery of SSCEP objectives. The Applicant submitted further information on how the Community Benefit Fund would operate as part of Deadline 1 within Post ISH1 Note - Community Benefit Fund [REP1-100]. Through the Community Benefit Fund, the Applicant would continue engagement with LCC on where any strategic funds can be directed subject to the receipt of more detail on the funding request from the LCC to ensure that it does align with the aims of the Community Benefit Fund to deliver direct benefits to the local community affected.

Reference	Topic	Matter Raised	Applicant's Response
10.11	Local Electricity Distribution	Whilst it is understood that the proposed development connects into the transmission network, comments on the local electricity distribution network constraint have previously been provided to enhance understanding of the local energy context and potential barriers to growth. It is welcomed that, if consented, the Applicant will provide a sum of money per MW in line with the guidance, which will benefit the wider community, and we look forward to hearing more about this in due course.	The Applicant submitted further information on the Community Benefit Fund as part of Deadline 1 within Post ISH1 Note - Community Benefit Fund [REP1-100].
10.12		While National Grid substations near Spalding are currently displaying distribution capacity, three other substations within South Holland are displaying increasing capacity constraints when other contracted proposals are taken into account.	This comment is acknowledged by the Applicant.
10.13		Further shortage of energy supply may restrict existing and potential businesses from achieving their potential growth and may limit, and impact on, the decarbonisation of these businesses. It will also be necessary to manage the narrative around the proposal in respect of this being an energy generation scheme, while nearby substations are increasingly capacity constrained.	As set out within the Planning Statement [APP-260], the Scheme would deliver up to 750MW of low carbon electricity and contribute towards meeting the growing energy demand. Furthermore, the Scheme will also support resilience of the grid through the provision of BESS. Connection to the NETS would be delivered via a new transmission line (proposed as part of the Scheme) and a new substation (to be

Reference	Topic	Matter Raised	Applicant's Response
			brought forward by NGET), rather than reliance on existing transmission assets and substations.
10.14	Accessibility	The DCO application should consider how employment can be made accessible (in terms of travel) for local people to be able to access employment. The Council suggest the following mitigating factors: • Funded travel to work schemes – LCC are able to help scope and identify suitable projects in the study area. • Engagement and partnership with local transport providers • Support for local people to access private transport at reduced cost, where the above solutions are not possible (last resort). • Where possible, these transport schemes should encourage use of a low carbon vehicle and ensure there is provision for EV charging at the site to encourage use of EVs for the journey to work.	The Applicant can confirm that workforce travel measures have been incorporated into the oCTMP [APP-278 and REP1-067], including measures to encourage sustainable travel and car sharing. The Applicant will continue to consider opportunities to engage with local transport providers and support sustainable travel choices, including electric vehicle (EV) charging infrastructure where appropriate. Detailed arrangements will be developed in consultation with relevant stakeholders and set out within the Detailed CTMP.
10.15	Socio-Economic Tourism Implications	The ES (Chapter 14) concludes that tourism impacts are “low adverse and not significant”, based on narrow criteria such as land-use effects and accommodation capacity.	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

Reference	Topic	Matter Raised	Applicant's Response
		These criteria overlook the cumulative visual transformation of a landscape valued for openness and big skies, visitor perception and destination appeal, the reliance of local businesses on rural character and the area's attractiveness to inward investment. The identification of 15 tourism sites within 500 m of the development underscores the economic importance of landscape quality.	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, where practicable, whilst retaining long-distance views through designed gaps in planting.
10.16		Tourism, recreation, and rural quality of life in South Holland are already fragile. Cumulative	This comment is noted. The cumulative assessment undertaken as part of ES Chapter 14: Socio-

Reference	Topic	Matter Raised	Applicant's Response
		industrialisation risks undermining visitor appeal, community wellbeing, business viability and future investment. This is a tangible socio-economic risk.	Economics and Land Use [APP-065] acknowledges that a number of developments within South Holland are ongoing and have the potential to impact tourism, communities and business receptors. However, the assessment finds that, based on the limited effects of the relevant nearby developments, including the Scheme, these receptors would not experience a significant cumulative effect as a result of these developments.
10.17		On balance therefore, the Council considers the socio-economic impacts associated with the development to be negative.	The conclusion of LCC is noted. Please refer to the foregoing responses.

3.11. Human Health

Table 3-11: Human Health

Reference	Topic	Matter Raised	Applicant's Response
11.1	Introduction	The Council recognises the long-term benefits of renewable energy generation, including its contribution to climate change mitigation and associated health benefits. However, the proposed development has the potential to result in localised adverse impacts on health and wellbeing, particularly in relation to:	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]. A response to each of the points raised is provided in further detail in rows below. The management plans relevant to securing mitigation measures for the human health

Reference	Topic	Matter Raised	Applicant's Response
		• Construction-related impacts (noise, dust, traffic, disruption); • Long-term mental health and wellbeing effects; • Health inequalities, particularly among rural and vulnerable populations; • Uncertainty regarding EMF exposure; and • Limited clarity on health-enhancing opportunities and community benefit. These impacts are capable of being mitigated and, in some cases enhanced, subject to strengthened assessment and secured mitigation measures.	assessment include: OCEMP [REP1-061], OOEMP [REP1-063]; ODEMP [REP1-065]; OCTMP [APP-278 and REP1-067]; OPRoW-MP [AS-026]; and OLEMP [REP1-070].
11.2		The Lincolnshire Joint Health and Wellbeing Strategy identifies priorities including mental health and wellbeing, healthy weight and physical activity. Changes to the environment and landscape associated with the scheme may disproportionately affect these populations, and this requires thorough assessment.	The Applicant notes this response. ES Chapter 10: Human Health [APP-061] has considered the local health priorities set out in the Joint Health and Wellbeing Strategy for Lincolnshire.
11.3	Approach to Human Health Assessment	The inclusion of a dedicated Human Health chapter within the ES is welcomed. However, the assessment would be strengthened by adopting a more explicit Health Impact Assessment (HIA) approach, including the consideration of direct, indirect, and cumulative impacts, greater emphasis on mental health and	Applicant's response to this comment is provided under LCC-107 response in Table 2.3 of Relevant Representation Report [REP1-074].

Reference	Topic	Matter Raised	Applicant's Response
		wellbeing and the consideration of health inequalities and vulnerable groups.	
11.4	Construction Phase Impacts	The construction phase has the potential to impact local communities through air quality impacts (particularly dust and particulate matter), noise and vibration, increased traffic movements affecting safety and amenity and disruption to local communities potentially resulting in short-term mental wellbeing impacts.	Applicant's response to this comment is provided under LCC-109 and LCC-110 of Table 2.3 of Relevant Representation Report [REP1-074]. The Applicant acknowledges that the construction phase has the potential to result in impacts on local communities as a result of air quality impacts, noise and vibration impacts and impacts that result from increased traffic movements. The Applicant has assessed these potential impacts within the following documents of the Environmental Statement: • ES Chapter 6: Air Quality [APP-057]; • ES Chapter 13: Noise and Vibration [APP-064]; and • ES Chapter 15: Traffic and Access [APP-066]. The assessments set out in these chapters conclude that with the proposed mitigation in place, there would be no significant effects in relation to Air Quality and Traffic. In regards, to Noise and Vibration, it is concluded that with the implementation of the proposed mitigation, no

Reference	Topic	Matter Raised	Applicant's Response
			likely significant effects were identified, with the following two exceptions: • A potentially significant adverse effect was identified at one receptor at Broad Gate along the Grid Connection Route, which would be affected if Horizontal Directional Drilling activities are required at night-time for the diversion of third-party assets. Subject to detailed design, the Scheme may oversail the assets and, therefore, undergrounding works may not be required. Furthermore, at this stage, the exact plant for the undergrounding of the third-party assets is unknown and, therefore, even if undergrounding is required, the effects are likely to be overestimated. • Likely significant construction traffic noise effects were identified at properties along Langary Gate Road during peak construction activity. ES Chapter 10: Human Health [APP-061] finds that during the construction phase the Scheme's impact on mental health is considered to be low, when considering the overall balance of adverse and beneficial effects. It is thus considered that the

Reference	Topic	Matter Raised	Applicant's Response
			Scheme will have minor adverse effects on both the general population and on vulnerable groups. These are considered not significant.
11.5		Without effective mitigation, these impacts could negatively affect nearby residents, particularly sensitive receptors. The implementation of a robust CEMP, controls on noise, dust, and working hours and measures to minimise impacts on sensitive and vulnerable populations, could support the reduction of the overall impacts of the construction phase.	The Applicant notes the comment and confirms that mitigation measures are included in the OCEMP [REP1-061] for noise (Section 2.5), dust (Table 3-2) and working hours (Section 2.4). If the DCO Application is approved, a detailed CEMP will be produced in accordance with Requirement 12 of the Draft DCO [REP1-006], and prior to commencement of construction. The detailed CEMP will be substantially in accordance with the measures set out in the OCEMP [REP1-061] and will be subject to approval by the relevant planning authority, in consultation with the relevant highway authority, the Environment Agency, and Lincolnshire County Council.
11.6	Operational Phase Impacts	While operational impacts on physical health are likely to be limited, there are potential long-term impacts on mental health and wellbeing, including living in proximity to large-scale infrastructure, loss of open views and changes to landscape character, potential sense of enclosure, long-term perception of environmental change. In addition, there is potential	The Applicant acknowledges LCC's concerns on the potential long-term impacts on mental health and wellbeing and confirms that this has been assessed in ES Chapter 10: Human Health [APP-061]. It is considered that during the operational period of the Scheme there will be a negligible (not significant)

Reference	Topic	Matter Raised	Applicant's Response
		for cumulative impacts alongside other infrastructure developments in the area.	effect with regards to mental health on both the general population and on vulnerable groups.
11.7		These factors may adversely affect wellbeing over the lifetime of the scheme and are not currently fully explored. The Council recommend further assessment of long-term and cumulative mental wellbeing impacts and the identification of appropriate mitigation and enhancement measures.	An OOEMP [REP1-063] has been prepared to accompany the Application to secure mitigation measures for the operational period and will be secured through Requirement 13 of the Draft DCO [REP1-006] . A cumulative assessment of all health determinants, including mental health, is presented in Section 10.11 of ES Chapter 10: Human Health [APP-061]; this concluded no significant cumulative effects. The Applicant considers that the potential operational effect and cumulative effects with other developments have been fully considered and that the assessment presented within ES Chapter 10: Human Health [APP-061] is robust.
11.8	Landscape, Green Infrastructure and Health Opportunities	The scheme presents opportunities to deliver health benefits, including the enhancement of green infrastructure, opportunities to PRow and promotion of active travel and physical activity. While some measures are proposed, the potential to maximise these benefits is not fully realised.	The Applicant recognises the opportunities that the Scheme has to deliver health benefits. For the Applicant's response, refer to LCC-112 of Table 2.3 of Relevant Representation Report [REP1-074].
11.9		Strengthening the proposals to enhance access to green space, improve connectivity and accessibility	The Applicant recognises the opportunities that the Scheme has to deliver health benefits. For the

Reference	Topic	Matter Raised	Applicant's Response
		and support community use where appropriate would support the health and wellbeing of local communities. Early implementation of landscaping and habitat creation is strongly encouraged to maximise both mitigation and health benefits.	Applicant's response, refer to LCC-112 of Table 2.3 of Relevant Representation Report [REP1-074].
11.10	Electromagnetic Fields	The current assumption that EMF impacts are not significant is not sufficiently justified. Potential exposure, particularly from grid connection infrastructure and overlapping sources, has not been fully assessed. Provision of a full EMF assessment, clear demonstration of compliance with International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, consideration of cumulative exposure and the exploration of measures to minimise exposure (e.g. underground cabling) would support the assessment of EMF and the perceived negative effects on local communities.	Refer to LCC-111 in Table 2.3 of Relevant Representation Report [REP1-074].
11.11	Health Inequalities	The development has the potential to disproportionately affect certain groups, including rural populations and those with existing health vulnerabilities. Without explicit consideration, the development may contribute to widening health inequalities. Assessment of distributional impacts and identification and implementation of targeted mitigation measures would be welcomed.	Refer to response LCC-108 in Table 2.3 of 8.5 Relevant Representation Report [REP1-074].

Reference	Topic	Matter Raised	Applicant's Response
11.12	Community Benefit and Fuel Poverty	There is an opportunity to deliver meaningful community benefits including contribution to addressing fuel poverty and wider benefits to local health and wellbeing. Exploration of direct benefits to affected communities and consideration of a Community Fund aligned with local needs is recommended.	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. The Applicant submitted further information on the Community Benefit Fund as part of Deadline 1 within Post ISH1 Note - Community Benefit Fund [REP1-100].
11.13	Conclusion	The proposed development has the potential to adversely impact mental health and wellbeing, health inequalities and local community amenity. Therefore, the Council considers the impacts associated with matters on Human Health to be negative. However, these impacts are capable of being mitigated and enhanced through strengthened health assessment (including HIA principles), clear, enforceable mitigation and the maximisation of opportunities to improve health and wellbeing.	The Applicant notes the comment.

3.12. Minerals and Waste

Table 3-12 Minerals and Waste

Reference	Topic	Matter Raised	Applicant's Response
12.1	Minerals	The Applicant has provided a Minerals Safeguarding Assessment (MSA) at Appendix F of the Planning Statement [APP-266]. As stated in the Councils Relevant Representation [RR-111] the MSA identifies that the proposed site intersects with parts of the MSAs 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. The Council has reviewed the Applicant's MSA and has no further comments to those made in its Relevant Representation [RR-111] and is satisfied that the proposals would comply with the safeguarding policies in the LMWLP and SELLP set out above. Therefore, the Council does not object to the proposals on minerals or waste safeguarding grounds. No part of the site intersects or encompasses any existing or allocated minerals or waste sites.	The Applicant notes this comment.
12.2	Waste	The Council welcome the assessment and various references to the waste hierarchy and proximity	The Applicant notes this comment.

Reference	Topic	Matter Raised	Applicant's Response
		principle throughout the application documents. The Council provided comments in its Relevant Representation [RR-111] and anticipate that further information will be submitted to address and clarify the points raised. The Council will provide updated comments when more information becomes available during the examination and through the SoCG.	
12.3		Following further scrutiny of the assessment, the Council additionally queries the following aspects of the cumulative assessment: (below two points)	Applicant's responses are provided in rows below.
12.4		The 'total waste from cumulative schemes (tonnes)' set out in the first row of table 16.31: Cumulative Waste Assessment does not match the total figures at the bottom of table 16.30: Cumulative developments for waste assessment. For example, total PV panel waste is stated as 386,965 tonnes in 16.30, however in table 16.31 it is stated as 77,393 tonnes. This therefore affects subsequent figures. Consequently, the corresponding m ³ calculation, magnitude of impact and significance of effect may also be underestimated.	The first row of Table 16.31: Cumulative waste assessment of ES Chapter 16: Other Environmental Topics [APP-067] is the solar panel waste from Table 16.30 (386,965 tonnes) divided by five years which is 77,393 tonnes. The justification for dividing by five years is provided in paragraph 16.6.104 of the ES Chapter 16: Other Environmental Topics [APP-067]. Whilst it is recognised that there will be some overlap in decommissioning timescales, it is highly unlikely that all 7,601 MW of solar panel waste outlined in the cumulative assessment would be generated within the same one-year period and is deemed an unrealistic scenario.

Reference	Topic	Matter Raised	Applicant's Response
12.5		The Council is also aware of a further NSIP scale solar development in Lincolnshire, Windsock Solar, that has now commenced its pre application engagement and should be included in the assessment.	As outlined on the Windsock Solar Farm website the project would comprise a 200 MW solar farm. Based on the methodology outlined in the cumulative assessment in ES Chapter 16: Other Environmental Topics [APP-067] this would equate to an additional 27,274 tonnes of total waste (10,182 tonnes of solar panel waste and 17,092 tonnes of other waste). Total solar panel waste including Windsock Solar Farm would therefore be 397,147 tonnes, other waste would be 666,678 tonnes and total waste would be 1,063,824 tonnes. When this is divided by five years, the assessment still shows that under the realistic worst case and absolute worst case, cumulative impacts would not be significant.
12.6		The Council's own estimate of the number of waste PV panels likely to arise from the decommissioning of solar developments in Lincolnshire supports the view that the cumulative assessment underestimates the scale of waste likely to be generated. It is currently estimated that approximately 16 million PV panels would require recycling and/or disposal at decommissioning alone, see Appendix iii. 93 Page 279 Based on the Applicant's module weight of 33.6kg per module (paragraph 16.1.600) this would result in approximately 537,600 tonnes of	The cumulative assessment ES Chapter 16: Other Environmental Topics [APP-067] (including Windsock Solar Farm as requested) outlines total solar panel waste as 397,147 tonnes. The Lincolnshire County Council estimates in Appendix iii. 93 Page 279 includes a total of 7,700 MW (13 NSIPs with a total of 6,590 MW and a total for TCPA of 1,100 MW). The cumulative assessment in ES Chapter 16: Other Environmental Topics [APP-067] includes a total of 7,801 MW (14 NSIPs with a total of 7,005 MW and a total for TCPA of 796 MW).

Reference	Topic	Matter Raised	Applicant's Response
		solar PV panel waste requiring recycling and/or disposal.	Whilst the MW for TCPA is lower in the cumulative assessment in ES Chapter 16: Other Environmental Topics [APP-067], the total MW is higher than the LCC estimates which would therefore equate to more solar panels if the same kW size per panel is used. The total number of solar panels in the LCC estimates (approximately 16 million) is based on a 2,210 panels per MW which is about 0.45kW per panel. If this is applied to total MW in the cumulative assessment in ES Chapter 16: Other Environmental Topics [APP-067] of 7,801 MW this could be approximately 17 million solar panels, a higher estimate than the LCC estimates.
12.7		Furthermore, as raised in our Relevant Representation [RR-111] the Council are concerned that the cumulative assessment has been limited to decommissioning. PV panel waste from operational failures and repowering also potentially raises a significant issue. The Council do not agree with the Applicant's reasons for excluding them from the assessment. It is considered likely that schemes with similar lifecycles (40 to 60 years) will overlap in terms of year on year operational failures and the need to repower. This would also apply to planning applications for schemes prior to 2020 that were discounted from the decommissioning	As outlined in paragraph 16.6.102 of the cumulative assessment in ES Chapter 16: Other Environmental Topics [APP-067], the cumulative assessment focuses on decommissioning waste due to the following: • 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.

Reference	Topic	Matter Raised	Applicant's Response
		assessment. Whilst failures and replacement programmes may vary and occur intermittently at individual sites, the large number of solar developments currently proposed and/or consented across Lincolnshire means that, collectively, significant volumes of waste could arise over the same period, as such the cumulative assessment should adopt a more precautionary approach. Further comments are provided in Section 19 below.	Schemes prior to 2020 would unlikely to be decommissioned at the same time as those post 2020. The cumulative assessment focuses on decommissioning however the assessment would also be applicable to a wholesale replacement at anytime during operation. A precautionary approach and absolute worst case that all waste goes to landfill is already included in the cumulative assessment.
12.8		The commitment in the application documents to maximise recycling and reuse of the scheme components at the end of their life is acknowledged. Solar PV panels are recyclable and, although UK recycling capacity is currently limited, the applicant considers that high recovery rates would be achievable due to proven technology and strong economic and regulatory drivers (16.6.98).	The Applicant notes this comment.
12.9		In respect of LMWLP Policy W1, the Council is required to make provision for sites to meet future predicted capacity gaps for waste arisings. There are currently no waste facilities locally to process discarded solar infrastructure as it is replaced during the lifetime of the development and at decommissioning stage. The Council is	The Applicant acknowledges that additional facilities to recycle solar panel will be required. As outlined in ES Chapter 16: Other Environmental Topics [APP-067] paragraph 16.6.76, 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, not least

Reference	Topic	Matter Raised	Applicant's Response
		concerned about the lack of capacity to manage this waste stream, particularly the quantity of PV panels arising cumulatively alongside other similar projects proposed in Lincolnshire and adjacent areas. This applies not only at decommissioning but also for PV panels which fail, or are routinely replaced, during construction and operation phases or as a result of weather-related impacts (note the impact of Storm Darragh on the Porth Wen Solar Farm on Anglesey). When combined with the other solar projects in the county and region, cumulatively this will potentially present a significant issue and additional facilities will be needed to ensure these waste products are sustainably disposed of.	because the recycling market will have expanded to meet demand as solar PV installations increase. Contact has been made with a solar panel recycling facility (Pravas) and the company has confirmed they can process around 600 solar panels a day (in one shift) and plan to increase throughput by increasing to 24 hour operation and opening a second facility in the next 12-18 months, with potential to process 3,000 solar panels a day. This would equate to about 760,000 panels a year based on 253 working days. This provides some evidence that the recycling markets are already starting to expand. Other solar panel recycling facilities are likely to be making similar plans to expand capacity.
12.10		For all phases of the development the Applicant is placing considerable reliance on the market response to demand for recycling facilities. Even if it could be assumed that the market would respond to the demand for recycling facilities, it is uncertain where the capacity would be provided. Where possible, local waste facilities should be used to reduce mileage and associated impacts but, given that they may not be available locally, transport needs to be taken into account in	

Reference	Topic	Matter Raised	Applicant's Response
		assessing the emissions arising from waste handling.	
12.11		The Council, in its role as Waste Planning Authority, has a statutory duty to prepare a Waste Local Plan that ensures sustainable waste management within its jurisdiction. The Council must assess the existing and future generation of waste arisings over the plan period, and produce a comprehensive, long-term plan to identify sufficient opportunities to meet the identified waste management needs of the area, aiming to drive waste management up the waste hierarchy.	The Applicant notes this comment.
12.12		This involves setting strategic policies, engaging with stakeholders and the public, identifying sites and facilities where a need is identified, and aligning with national planning policy. The plan must also safeguard existing waste facilities, promote waste reduction and recycling, and support the transition to a circular economy. This process relies heavily on having a complete set of data on the likely waste streams, which we currently do not have for potential future solar waste. Whilst it may be possible for sites to be identified in the plan, it would then still fall to the market to deliver the facilities.	ES Chapter 16: Other Environmental Topics [APP-067] provides data on the likely waste streams and this is based on the data available at the time of writing and is complete as possible.

Reference	Topic	Matter Raised	Applicant's Response
12.13		In relation to the draft DCO [APP-028], the commitments to produce and consult LCC on a CEMP (Requirement 12) and OEMP (Requirement 13), together with the requirement to submit a and obtain approval from LCC for the SWMP (Requirement 14) are welcomed. The commitments in the OEMP and DEMP to review and update the SWMP for each phase of the development are also welcomed. The Council would also wish to be consulted on the DEMP (Requirement 21).	Requirement 21 of the Draft DCO [REP1-006] was updated to include LCC as a consultee at Deadline 1.
12.14		The commitments in the oOEMP [APP-276] to share waste data and reporting on waste types and volumes to support regional waste planning are likewise welcomed. However, the Council considers that these commitments should be strengthened by requiring annual reporting of waste arising figures to the Waste Planning Authority together with the provision of a planned annual maintenance schedule. Similar requirements have been secured through the OEMP for the One Earth, Springwell and Tillbridge Solar DCO's.	The Applicant will review and update the OOEMP [REP1-063] for Deadline 3.
12.15		On the basis of the above commentary, and until such time as the Applicant can provide further information regarding waste arisings and in	ES Chapter 16: Other Environmental Topics [APP-067] provides data on the likely waste streams for the Scheme for construction, operation and

Reference	Topic	Matter Raised	Applicant's Response
		reference to cumulative impacts, the Council consider that the development would have a negative impact in terms of waste. The Council would be happy to engage further with the Applicant regarding these matters, including through the SoCG.	decommissioning and this is based on the data available at the time of writing. A cumulative assessment has been provided in ES Chapter 16: Other Environmental Topics [APP-067] which provides total estimated solar panels and total other waste for solar farm cumulative developments.

3.13. Cumulative Effects

Table 3-13: Cumulative Effects

Reference	Matter Raised	Applicant's Response
13.1	It is noted that consents older than 5 years for NSIPs and 3 years for other types of applications have been excluded from the long-list of cumulative schemes, as it has been assumed they will have either been constructed, be under construction and completed prior to the construction of the Meridian scheme starting, or the consent has expired. These time thresholds appear arbitrary as projects can experience significant delays, can take many years to complete and may also exclude projects that are still capable of being implemented. A more acceptable approach would have been to review projects individually and exclude them based on evidence that they would not overlap with the Meridian project. Notwithstanding, the Council is satisfied that the Applicant has captured the relevant NSIP's and TCPA applications	The methodology used for the assessment of inter-project cumulative effects set out in Section 4.7 of ES Chapter 4: Overview of the EIA Process [APP-055] was undertaken in accordance with the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment' which states temporal scope criteria should be used <i>"to establish whether there is overlap and any potential for interaction."</i> The five years for NSIPs and three years for other types of planning applications was therefore selected based on common planning and consent implementation periods. For 'other types of planning applications' development must commence within three years of the permission being granted unless and alternative timescale is specified. Similarly, for NSIP's Development Consent Orders generally include a requirement

Reference	Matter Raised	Applicant's Response
	highlighted by the Council within the 30km Zone of Influence (ZOI). The countywide ZOI for solar NSIP and TCPA applications for the assessment of agricultural land and waste is welcomed, subject to the inclusion of Windsock Solar, as highlighted in section 18 above.	for development to commence within 5 years of the DCO being granted. As such, NSIPs older than 5 years and other types of planning applications older than three years are generally expected to have either commenced construction, be substantially progressed, be operational or have expired. Whilst it is acknowledged that some projects may experience delays, it is important to apply these thresholds to focus the assessment and ensure that it is proportionate. The Applicant welcomes the comment from LCC that Applicant has captured the relevant NSIPs and TCPA applications highlighted by LCC within the 30km ZOI. The Applicant notes that Windsock Solar is located outside the 30km ZOI (i.e. approximately 35km from the Site), hence it would only be relevant for the consideration of cumulative effects for waste and agriculture and soils within the administrative area of LCC. Refer to response 12.3 with regards to the consideration of the cumulative effects for waste. With regards to agriculture and soils, the Windsock Solar scheme is currently at early stages of consultation and therefore, there is no survey information available on the ALC grade for the Site. However, desk-based information indicates that the Windsock Solar scheme would involve approximately 260ha of development on Grade 2 and 3 ALC land. Whilst there is an additive effect to the use of agricultural and BMV land, the conclusion presented within paragraph 5.11.6 of ES Chapter 5: Agriculture and Soils [REP1-014], with regards to the solar

Reference	Matter Raised	Applicant's Response
		schemes representing a small proportion of agricultural and BMV land in the County would remain valid.
13.2	The nature and scale of current and emerging proposals relating to large scale solar developments and other NSIP scale developments in Lincolnshire is particularly significant. At the time of writing this report 9 NSIP scale solar schemes have been granted a DCO in Lincolnshire and a further three schemes (including Meridian) are either progressing through recommendation, decision, examination or pre-application stage. In addition, the county is host to a further 11 NSIP proposals, including five great grid upgrade proposals and a new Lincolnshire reservoir. Other new NSIP proposals are currently emerging and these figures are expected to increase during 2026. The cumulative effects of the Meridian Solar scheme, in combination with other major infrastructure developments identified, could be considerable. These impacts, in particular impacts on landscape character and visual amenity, ecology, heritage, waste management (from construction, operational and decommissioning activities), socio-economic factors, traffic and the loss of BMV agricultural land have been considered in greater detail within the relevant topic-specific chapters above. The Council would also highlight that cumulative amenity impacts could occur on local communities from	The Applicant acknowledges the number of existing and emerging NSIP scale developments in Lincolnshire and recognises the importance of considering the potential for cumulative effects arising from these projects in combination with the Scheme. The Applicant has provided a response to the matters raised in Table 6-10 of Relevant Representation Report [REP1-074] as well as within the relevant topic areas above. As set out within paragraph 4.7.22 of ES Chapter 4: Overview of the EIA Process [APP-055], each of the technical assessments within the ES considered which cumulative assessment scenario would present a worst case, Scenario 1 assumed that the peak construction periods of all cumulative schemes overlap and Scenario 2 considered that the cumulative schemes are built out sequentially and therefore, result in an overall longer cumulative construction period. ES Chapters 5 to 16 then report which scenario presents the worst-case for the topic on the basis of which the cumulative effects assessment has been completed.

Reference	Matter Raised	Applicant's Response
	consecutive and protracted construction periods, not only those that overlap.	
13.3	With regard to cumulative landscape and visual effects with other renewable energy and infrastructure projects across the county, these present a further concern. The clustering of a large volume of energy infrastructure around Weston Marsh, accommodating Weston Marsh substations, Grimsby to Walpole, Outer Dowsing, and Weston Marsh to East Leicestershire, as well as the proposed Meridian development, is forecast to be delivered over a prolonged period and lead to adverse cumulative impacts. The scale of other NSIP's and large-scale energy projects proposed in the wider area raises the potential for extensive alteration of the regional landscape character. The combined effect of these developments could be a marked and enduring change, both directly through a change in land use and introduction of solar as a key element, but also in the perception and experience of the landscape, particularly for visual receptors travelling through the landscape and experiencing sequential effects. This is a clear and marked change to landscape character.	The Applicant has provided a full response to this comment in Table 6-10 of the Relevant Representation Report [REP1-074] and provide a summary of the response below. Cumulative landscape and visual effects with other developments are set out within ES Appendix 12-7: Landscape and Visual Cumulative Assessment [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, 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 a significant effect. The Applicant has sought to minimise effects on residential properties, as far as reasonably practicable, through the routing 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. Setbacks are secured within the Works Plans [APP-009 and APP-010] and the OLEMP [REP1-070] to

Reference	Matter Raised	Applicant's Response
		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.
13.4	Furthermore, there is recognition in Lincolnshire that the cumulative growth in energy infrastructure is contributing to a fundamental change in the character of Lincolnshire landscapes. In the Springwell Solar DCO decision the SoS recognised that the cumulative impacts of solar and related developments represent a level of impact which will no doubt be reflected in any future landscape character assessment across the region and agreed with the ExA's view that this cumulative effect constitutes a new defining land use characteristic, representing a clear and marked change to the landscape character of that area.	The Applicant notes this comment and has provided a response above in Table 3-8.
13.5	This is also of relevance to the assessment of the historic environment. The ES identifies a moderate adverse and significant cumulative effect on the historic landscape character of the Fens and The Wash that would arise from the presence of multiple energy and infrastructure developments in the area, as has been described in section 14 above.	The Applicant's response to the points raised by LCC in relation to cumulative effects on the historic environment is set out above in Table 3-8.
13.6	As the proposal would result in the considerable loss of arable land, and therefore the potential for cumulative	The Applicant's response to the points raised by LCC in relation to cumulative effects on ecology are set out above in Table 3-4

Reference	Matter Raised	Applicant's Response
	impacts with other developments, in particular large scale solar development, on ground nesting birds is important. Further information is required to confirm that the proposed mitigation would be adequate. As such, currently the Council do not agree with the Applicant's conclusion that there would be no significant cumulative effects on ecology.	and within Table 5-6 of the Relevant Representations Report [REP1-074] in response to the comments raised by Lincolnshire Wildlife Trust.
13.7	As Waste Planning Authority, the Council is also concerned about the impact from cumulative waste arisings from solar developments and the lack of existing waste capacity. The waste arisings from these proposals combined, during the construction and operational phases as well as at decommissioning, are potentially significant.	The Applicant's response to the points raised by LCC in relation to cumulative waste are set out above in Table 3-12.
13.8	Based on currently available data, the Council estimates that, should all solar NSIPs and TCPA schemes in Lincolnshire be consented, the cumulative number of solar panels potentially requiring recycling or disposal at the point of decommissioning could be in the region of 16 million units. While the Council acknowledges that decommissioning is a long-term consideration, we are increasingly concerned about the ongoing annual failure rates of solar panels across these schemes. Even a modest failure rate of 0.2% would result in approximately circa 32,000 panels requiring replacement each year. It is important to note that some schemes are reporting higher annual failure rates, which could significantly increase this	The Applicant's response to the points raised by LCC in relation to cumulative waste are set out above in Table 3-12.

Reference	Matter Raised	Applicant's Response
	figure, see Appendix iii. The Applicant's cumulative assessment focuses on decommissioning waste, as has been described in section 18 above. However, the Council would wish to see consideration also given to cumulative annual failure rates and the associated waste arisings.	
13.9	The Council is concerned that the cumulative socio-economic effects of the proposed development in combination with other NSIPs and major infrastructure projects, have not been adequately assessed. In particular, insufficient consideration has been given to the effects of potentially significant industrialisation on local landscape, public access, agriculture, historic and natural environment, and community. The cumulative industrialisation of the countryside also has the potential to affect the perception of the county to visitors and tourists as well as residents and businesses which is also material to the local economy. In addition, there are also significant concerns about the impacts on temporary worker accommodation as is set in section 16 above.	The Applicant's response to the points raised by LCC in relation to cumulative socio-economic effects are set out above in Table 3-10.
13.10	The Council is particularly concerned about the cumulative impact of large scale solar development on agricultural land, particularly given how important agricultural production is to the county. The cumulative loss of all agricultural land for arable production when combined with other projects across the district and county, is considered to be cumulatively significant in terms of food	The Applicant notes this comment and has provided a response above in Table 3-9.

Reference	Matter Raised	Applicant's Response
	production and security and the residual socio-economic impact of this loss. If Lincolnshire is on course to cumulatively contribute around 3% of its agricultural land to solar projects, then arguably it is contributing disproportionately to the national objective, whereby the LUF estimates that the approximate area of agricultural land to be used for solar and wind energy by 2035 will be about 1% (or 1.8% of its Utilised Agricultural Area) in England. This effect is compounded by virtue of the fact that much of the land affected will be high quality BMV land, running contrary to policy and the LUF, which promotes more BMV land for producing food.	
13.11	The potential for significant inter-projects effects to arise from this development in combination with other developments is of particular concern and as such the Council's position on cumulative impacts in the overall balance is negative. The Council will make further comments on the potential cumulative impact of the development with other NSIP proposals as further information on the other projects comes forward.	The Applicant notes the LCC's concerns and will consider any further comments provided by LCC regarding the potential cumulative impacts of the Scheme in combination with other NSIP proposals once received.

3.14. Fire Safety

Table 3-14: Fire Safety

Reference	Topic	Matter Raised	Applicant's Response
14.1	Introduction	The provision of a detailed BSMP would be secured via a requirement in the DCO, in consultation with Lincolnshire Fire and Rescue (LFR) and the Environment Agency. Furthermore, the detailed design of the BESS must be in accordance with the oBSMP, the Design Approach Document (DAD) [APP-268] and Design Parameters [APP-269], which contain controls over the BESS including the energy storage capacity and the battery type i.e. that the BESS would be based upon a lithium-ion battery system. This commitment is welcomed by the Council.	The Applicant welcomes these comments and would note that the detailed design of the BESS must be in accordance with the Outline Battery Safety Management Plan (OBSMP) (Doc Ref. 7.18 Rev 1) and the Design Parameters [REP1-055]. The Design Approach Document [APP-268] is not a control document in itself.
14.2		With specific reference to the oBSMP, LFR have provided the following comments: (below seven rows)	The Applicant welcomes LCC's comments and has responded to each one below.
14.3	OBSMP – LFR comments	At this stage, the oBSMP contains generic information, e.g. BESS enclosures, battery technology to be employed etc. LFR will need to be sighted on specific details as they become available, including, but not limited to spacing distances, safety measures based on battery technology and compliance with specific standards.	The Applicant's Outline Battery Safety Management Plan (OBSMP) has been developed to fully accommodate 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

Reference	Topic	Matter Raised	Applicant's Response
			(LFR) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The OBSMP documents the fire and explosion protection requirements for the illustrative BESS design and the BESS system that is selected at the detailed design stage. The Applicant's OBSMP 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. 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). The Scheme design and documentation is fully compliant with UK NFCC 'Grid Scale Battery Energy Storage System planning – Guidance for FRS (2026)'.

Reference	Topic	Matter Raised	Applicant's Response
			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. The Applicant will continue to engage with LFR on BESS system and site design details as they become available at the detailed design stage. Section 4.4 of the OBSMP documents examples of BESS design and site layout information that will be shared with LFR.
14.4		The document currently provides only generic references to installation standards. More detailed design and installation standards must be provided at the appropriate stage as they become available.	Section 2.2 (Safe BESS Design) of the Applicant's OBSMP documents the key BESS safety and testing standards that selected BESS design must conform to. Section 4.4.4 of the OBSMP stipulates: <i>"Information will be supplied as early as possible in the detailed design stage to allow an initial appraisal of the BESS to be made. This information will be provided to LFR with appropriate evidence provided to support any claims made on performance, and with appropriate standards cited for installation. Such information should also be made available to LFR for inclusion in Site Specific Risk Information (SSRI) records."</i>

Reference	Topic	Matter Raised	Applicant's Response
			The Applicant will continue to engage with Lincolnshire Fire and Rescue Service (LFR) and will supply all relevant details as soon as they become available at the detailed design stage.
14.5		Further detail is required regarding the proposed fire suppression systems within BESS containers. This should be provided during the design phase and include system type, activation method, and performance capability.	Section 2.6 (Detection and Fire Protection Systems) of the OBSMP outlines systems which will be considered for the Scheme. Details on any fire suppression system within the BESS containers (if integrated) will be shared and agreed with Lincolnshire Fire and Rescue Service (LFR) at detailed design. As stipulated in Section 2.6.6 of the OBSMP: "An independent Fire Protection Engineer specialising in BESS will review all UL 9540A test results plus any additional fire and explosion test data which has been provided and validate the fire protection system design. System design and any water supply requirements must be fully agreed with LFR."
14.6		The information provided is currently generic regarding site access and accessibility. LFR will require detailed plans covering: (i) Access routes for fire appliances (ii) Turning facilities (iii) Operational working areas around plant and infrastructure	More detail on the access routes, turning facilities and operational working areas will be discussed and agreed with Lincolnshire Fire and Rescue Service at detailed design stage, and secured through the detailed BSMP. Section 4.2.2 of the OBSMP stipulates: The proposed access-route width around the BESS area will be 5m and there are no dead-end access routes or extremes of grade (accessible

Reference	Topic	Matter Raised	Applicant's Response
			in all weather conditions). Turning circles, passing places etc size to be advised by LFR depending on fleet. • Road networks within the Order Limits will enable unobstructed access to all areas of the BESS sites, two separate LFR access points to the BESS sites have been integrated to ensure firefighters do not have to drive through a smoke or gas plume to access the BESS. • Emergency access route plans for first responders will be included in the Emergency Response Plans (ERP) and hard copies will be available on site. Route sign requirements will be agreed with LFR.
14.7		LFR will require evidence of large-scale testing to demonstrate system performance and validate compliance with applicable safety standards.	The Applicant's OBSMP confirms this commitment in Section 5.1 (Pre-Construction Requirements). Sections 5.1.1 and 5.1.2 of the OBSMP confirm as follows: 5.1.1. The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation (during the construction phase of the Scheme) to decommissioning. At the detailed design stage, the selected BESS design will have completed LSFT to fully inform inputs for risk assessment tools which will be utilised together with detailed

Reference	Topic	Matter Raised	Applicant's Response
			consequence modelling to provide a comprehensive site operations and emergency response safety audit. 5.1.2. The battery system mitigation measures adopted in a final BSMP will reflect the latest BESS safety codes and standards applicable at that time. Mitigation measures will be discussed and coordinated with Lincolnshire Fire and Rescue Service (LFR).
14.8		The OBSMP currently references the Fire Service Manual (Section 4.1.1), which is now outdated. This should be replaced with the National Operational Guidance (NOG) to ensure alignment with current UK fire and rescue service practices.	This is noted, the Applicant will review this updated guidance and consider any amendments required.
14.9		Whilst the document provides a good overarching framework and addresses key topic areas, the level of detail is not yet sufficient. LFR strongly encourages continued engagement throughout the design phase and reserves the right to identify any elements that may not comply with current national guidance as further detail is provided.	This response is acknowledged. Communication was established early in the Scheme with LFR and will continue across planning, design, construction, operation, and decommissioning phases. This will ensure compliance with national guidance, robust emergency response planning, risk management planning and ensure all safety materials and equipment is available in an emergency for first responders.
14.10		In summary, the LFR Service remains committed to ongoing engagement throughout the examination process and wishes to have its views considered as	The Applicant notes the Council's comment. The detailed Battery Safety Management Plan will be secured pursuant to Requirement 6 of the Draft DCO.

Reference	Topic	Matter Raised	Applicant's Response
		specific elements of the fire strategy emerge. Subject to Requirement 6 (Battery Safety Management) and a firm commitment from the Applicant that a Protective Provision, to ensure the Fire Service has sufficient resources to conduct regular inspections of the BESS, will be forthcoming and secured in any DCO that may be granted, the development's impact on fire safety and pollution is currently assessed as neutral. This view is made without prejudice to any further information that may be forthcoming as the Examination progresses and is subject to all mitigation measures being properly implemented and maintained throughout the project's duration should consent be granted.	The Applicant confirms that it agrees to the protective provisions for the benefit of Lincolnshire Fire and Rescue as appended to the Local Impact Report and will incorporate these provisions into the Draft DCO submitted at Deadline 3.

3.15. Other Topics

Table 3-15: Other Topics

Reference	Topic	Matter Raised	Applicant's Response
15.1	Decommissioning	Paragraph 2.10.138 of NPS EN-3 also requires the SoS to ensure that the Applicant has put forward outline plans for decommissioning. An oDEMP has been submitted [APP-277]. In terms of implementation, the Applicant's Funding Statement [APP-033] states that current cost estimate of the scheme is approximately £500M	The Applicant notes the Council's comments. The Funding Statement [APP-033] expressly includes decommissioning within the estimated £500 million to £700 million cost of the Scheme and the Applicant therefore considers that decommissioning costs have been appropriately accounted for.

Reference	Topic	Matter Raised	Applicant's Response
		to £700M, which includes development costs, construction costs, preparation costs, supervision costs, land acquisition costs, equipment purchase, installation, commissioning, power export and decommissioning. It is unclear however what the component breakdown is across the overall estimate range provided, and therefore what portion of that sum is estimated to be required for decommissioning. As raised on other NSIP-scale solar schemes, the Council is concerned that the Applicant's Funding Statement does not evidence how decommissioning would be funded, nor does it illustrate how it would deal with long-term shutdowns should they occur.	The Applicant does not consider that a separate breakdown of estimated decommissioning costs or additional financial security is necessary. As noted above, Requirement 21 secures the decommissioning and restoration of the Scheme. Accordingly, no amendment to Requirement 21 is proposed.
15.2		To address this, the Council recommends adding to Requirement 21 in the draft DCO to ensure funding or a bond is in place to secure the provision for decommissioning, both after a long outage and at the end of the project's life. The Council would draw the ExA's attention to two other NSIP projects where this matter has been considered: • Helios Renewable Energy Project – The DCO made 3 December 2025 includes provision (Requirement 5(3)) to require the developer to	The Applicant does not consider that an additional requirement for a decommissioning fund or bond is necessary or proportionate. Requirement 21 already secures the decommissioning and restoration of the Scheme, including approval and implementation of a decommissioning environmental management plan. In addition, the Funding Statement [APP-033] expressly includes decommissioning within the

Reference	Topic	Matter Raised	Applicant's Response
		notify the Local Planning Authority that the undertaker has put in place the requisite decommissioning security no later than year 15 of operation. • Oaklands Farm Solar Park – page 8, paragraph 4.22 of the SOS's decision letter states that 'the Applicant stated a fund was not necessary since Requirement 22 of the dDCO secured decommissioning of the site, was legally enforceable, and was consistent with recent precedent. The Applicant considered its funding statement as part of the application demonstrated it had sufficient funds to construct, operate and decommission the Proposed Development.' This reinforces the Council's argument that if it is not demonstrated that decommissioning funding is suitably covered within the Funding Statement, then it would be in public interest to ensure that it is covered in the draft DCO by way of an additional Requirement.	estimated £500 million to £700 million cost of the Scheme. The precedents cited by the Council do not establish a general requirement for separate financial security. In particular, the Oaklands Farm Solar Park decision cited by the Council records the applicant's position that a separate fund was unnecessary where decommissioning was secured by the DCO and addressed in the funding statement. The Applicant therefore considers the existing provisions adequate and does not propose to amend Requirement 21 in this respect.
15.3		The Council would also highlight that the OEMP for the Heckington Fen Solar scheme made provisions for extended periods of outage that covered a situation whereby the development should stop generating electricity for a	The Applicant notes the approach taken in the Heckington Fen Solar scheme but does not consider an equivalent provision necessary for the Scheme. Requirement 21 already secures the decommissioning and restoration of the Scheme,

Reference	Topic	Matter Raised	Applicant's Response
		continuous period of 12 months for non-maintenance reasons and would enable the Applicant to provide details on the steps it is taking to rectify the issue along with an expected timeframe to recommence operation.	including a requirement for decommissioning to commence no later than 40 years following final commissioning. A temporary or extended outage would not necessarily mean that the Scheme had reached the end of its operational life or should be decommissioned. The Applicant therefore does not consider that a fixed period of non-generation should trigger decommissioning requirements. No amendment to Requirement 21 is proposed in this respect.
15.4		The Council may wish to make further representations as appropriate during the examination and at issue specific hearings relating to matters that are not contained within this LIR. Therefore, the comments contained above are provided without prejudice to the future views that may be expressed by the Council in its capacity as an Interested Party in the examination process.	The Applicant notes this comment.

3.16. Draft Development Consent Order (DCO)

Table 3-16: Draft DCO

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
16.1	Part 1: Interpretation and Schedule 2 Requirements	The definition of 'maintain' is considered to be too broad and would potentially allow for the repeated wholesale replacement of solar panels. Definition of maintain should be redefined so it is clearer that it would not allow the reconstruction or replacement of the whole development. See the Council's comments in section 18 above regarding concerns about waste arisings, particularly cumulatively with other developments.	The Applicant does not agree that the definition of "maintain" requires amendment. The definition has been drafted to provide appropriate flexibility for the inspection, repair, adjustment, refurbishment, reconstruction, replacement and improvement of components of the Scheme throughout its operational lifetime. This flexibility is necessary to ensure the continued operation and maintenance of the Scheme, including where components require replacement during the operational period. The Applicant does not consider the current drafting permits the replacement or reconstruction of the authorised development as a whole under the guise of maintenance. The Applicant therefore considers the existing drafting strikes an appropriate balance between providing flexibility required for effective operation and maintenance of the Scheme and ensuring that maintenance activities remain within the scope of the authorised development.

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
16.2	Part 3 (Streets): Articles 9 and 11 Street Works Power to alter layout, etc., of streets	As currently written these articles would give the developer the right to undertake works with no further approvals from the Council. At this stage, the technical details have not been submitted or approved. The Council require highway access works to be delivered via the Section 184 process (or equivalent agreement) which would also for consideration of detailed design and allow for the provision of a bond which, if the developer was unable to complete the works, the Council would be able to draw upon to make the Highway safe.	The Applicant does not agree that articles 9 and 11 of the draft DCO [REP1-006] would enable the relevant highway works to be undertaken without further engagement with the Council. The purpose of those articles is to confer the statutory powers necessary to carry out the relevant street and highway works associated with the Scheme. This approach is consistent with the model provisions and has precedent in recent DCOs, including the Longfield Solar Farm Order 2023, the Gate Burton Energy Park Order 2024, the Cottam Solar Project Order 2024, the West Burton Solar Project Order 2025, and the Tillbridge Solar Order 2025. The detailed construction traffic arrangements are subject to further approval under Requirement 15 of the draft DCO. Requirement 15 provides that no part of the authorised development may commence until a construction traffic management plan for that part has been submitted to and approved by the relevant planning authority, in consultation with the relevant highway authority and National Highways. The detailed CTMP must be substantially in accordance with the oCTMP [APP-278] and must thereafter be implemented as approved.

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
			The Applicant does not consider that the relevant highway works should be subject to a separate approval under section 184 of the Highways Act 1980 where those works are authorised under the DCO. However, article 16 of the draft DCO provides for the ability for agreements to be entered into between the undertaker and the street authority in relation to relevant highway works, including works undertaken pursuant to articles 9 and 11. This would enable the Applicant and the highways authority to enter into further agreements to secure matters of detailed design, post-consent.
16.3	Part 3 (Streets): Article 10 Application of the permit scheme	The Highway Authority have concerns about the terms used in the draft article, particularly “a permit may not be refused”. It creates a presumption that permits will be granted and that disagreement is principally about conditions rather than whether the works should proceed at that time, which for a network on which 72,000 street works take place per annum needs to be a concern for us. There is nothing in the article that appears to expressly preserve the Highway Authority's ability to refuse permits on network management or coordination grounds. The Highway Authority view is that the	The Applicant notes the Council's comments. The Council's general understanding of Article 10 is correct. It is not considered appropriate for the Highways Authority to use a future permitting process to prevent necessary works granted under the DCO, when it has the opportunity through this Examination process to raise any issues with the nature of works proposed, and where the draft DCO [REP1-006] and oCTMP [APP-278] already contain further controls relating to the coordination and management of works

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
		proposed permit article does not adequately protect the Highway Authority's network management and coordination functions. In particular, it appears to create a presumption that permits must be granted and does not expressly preserve the Authority's ability to refuse, defer or amend permit applications on coordination, traffic management or network capacity grounds. The Authority would seek additional provisions requiring appropriate advance notice of road closures and temporary traffic management, together with express wording confirming that the Authority retains the ability to refuse or modify permit applications where reasonably necessary to fulfil its duties under the Traffic Management Act 2004, coordinate works and events on the network, and minimise disruption to road users. The Authority would also wish to ensure that the permit article cannot override or dilute approvals and protections secured elsewhere within the Highway Authority Protective Provisions. A further point to note is that other works can take place (e.g. unforeseen works) which the Authority would not be in a position to refuse and this	affecting the highway network, subject to the approval of the highways authority. In particular, the oCTMP provides that advance warning of temporary road closures will be provided in accordance with local highway authority guidance, with diversion routes put in place, and that any requirement for a temporary partial or full road closure will be discussed and agreed with LCC, with the relevant management and mitigation measures incorporated into the oCTMP. Requirement 15 of the draft DCO requires the oCTMP to be approved by LCC prior to commencement of the relevant part of the authorised development and to be substantially in accordance with the oCTMP. In addition, Article 17 requires the written consent of the traffic authority before the undertaker exercises the temporary traffic regulation powers in that Article and provides for advance notification to the traffic authority and police. In relation to the Council's concern regarding unforeseen works, Article 10(2)(d) expressly provides that nothing in that provision restricts the highway authority's ability to grant a permit for immediate

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
		conflicts with parts of the proposal at this time and should therefore be revised.	works. "Immediate works" are defined in Article 10(7) by reference to emergency works and urgent works under the relevant street works legislation. Finally, it is noted that Article 10 does not prevent the refusal of permits in all circumstances. Article 10(3) expressly contemplates refusal of a permit application following the process for consideration of alternative permit conditions. The modifications in Article 10(2) are directed to specified circumstances, including refusals or conditions which would impose a moratorium or conflict with the powers conferred by the DCO. This drafting is based largely on the National Grid Bramford to Twinstead Reinforcement Order 2024 and the Tillbridge Solar Project Order 2025
16.4	Part 3 (Streets): Article 13 Temporary closure, restriction or prohibition of use of streets and	Section 13(1) Contains general powers to alter or temporarily close any street or PRow. This power is considered too broad and should be subject to additional limitations. It should only apply to rights of way included in the PRow Management Plan and be exercised in accordance with the details set out in that plan, which must be agreed with LCC's PRow and Access Team.	The Applicant does not agree that the powers in Article 13(1) are insufficiently controlled. Article 13 must be read as a whole and alongside the other controls secured through the draft DCO [REP1-006]. In respect of streets specified in Schedule 5, the powers in Article 13(1) may only be exercised following consultation with the street authority. In respect of any other street, Article 13 requires the consent of the street authority, which may attach

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
	public rights of way		reasonable conditions to that consent. Accordingly, Article 13(1) does not confer an unrestricted power to alter or temporarily close any street or public right of way. In addition, Requirement 17 specifically controls the management of public rights of way identified in Schedule 6. No relevant part of the authorised development may commence until a public rights of way management plan for any sections of public rights of way shown in Schedule 6 as temporarily closed or managed has been submitted to and approved by the relevant planning authority, in consultation with the relevant highway authority. The approved plan must be substantially in accordance with the oPRoW-MP [AS-026] and must be implemented as approved and maintained throughout the construction, operation and decommissioning of the relevant part of the authorised development. The Applicant therefore considers that appropriate controls are already secured through Article 13 and Requirement 17 and does not consider the additional limitation proposed by the Council to be necessary.

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
16.5	Part 6 (Miscellaneous and General): Article 40 Felling or lopping trees or removal of hedgerows	This article provides a blanket approval to remove hedgerows and trees without the need to notify the relevant authority or provide replacement planting. This provision risks undermining the principles and calculation of BNG provision within the site and could result in the loss of valuable trees. The Council recommends that this article is amended to include strengthened safeguards to trees. The commitment set out in the outline CEMP table 3.9 is welcomed: <i>"Should the requirement for additional tree works be identified, this will be discussed with the Project Arboriculturist and no works will be undertaken without the prior consent of the relevant Local Planning Authority."</i> However, it is considered that this commitment would be afforded greater certainty if it were secured through a provision on the face of the DCO, rather than relying solely on the outline CEMP.	The Applicant does not agree that Article 40 provides an unrestricted ability to fell or lop trees or remove hedgerows without appropriate safeguards. Article 40(2) expressly requires the undertaker, in carrying out works under Article 40(1), to do no unnecessary damage to any tree, shrub or hedgerow and provides for compensation for any loss or damage arising from the exercise of those powers. This drafting has precedent in the Tillbridge Solar Order 2025, the Fenwick Solar Farm Order 2026 and the Springwell Solar Farm Order 2026. Further controls are secured through Requirement 12 of the draft DCO. Requirement 12 requires a Construction Environmental Management Plan (CEMP) to be submitted to and approved by the relevant planning authority, in consultation with, amongst others, Lincolnshire County Council, before commencement of the relevant part of the authorised development. The detailed CEMP must be substantially in accordance with the Outline CEMP [REP1-061] and must be implemented as approved. The Outline CEMP expressly provides that, where a requirement for additional tree works is identified, this

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
			will be discussed with the Project Arboriculturist and no such works will be undertaken without the prior consent of the relevant local planning authority. It also provides for a final assessment of arboricultural impacts to be undertaken as part of an Arboricultural Method Statement based on the final design of the Scheme. Accordingly, the commitment identified by the Council is secured through Requirement 12 of the draft DCO and does not rely solely on a commitment contained in the Outline CEMP. In relation to biodiversity net gain, the arboricultural impacts of the Scheme have been assessed in the Arboricultural Impact Assessment [APP-242 and APP-243] on a reasonable worst-case basis. The controls described above provide for any additional tree works to be identified and agreed, where required, prior to those works being undertaken. Accordingly, the Applicant considers that Article 40 does not provide an unrestricted mechanism through which additional tree or hedgerow losses may occur without consideration of the implications for the environmental mitigation and biodiversity net gain provision secured for the Scheme.

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
			The Applicant therefore considers that Article 40, read together with Requirement 12 and the measures secured through the CEMP, provides appropriate safeguards in respect of works to trees and hedgerows and does not consider that an additional provision on the face of the DCO is necessary.
16.6	Part 6 (Miscellaneous and general): Article 41 Trees subject to tree preservation orders	This article provides a blanket approval to remove trees subject to a Tree Preservation Order (TPO) made after the date of the Order without the need to notify the relevant authority or provide replacement planting. The Council recommends that better safeguards to protected trees are included in the DCO.	The Applicant does not agree that Article 41 provides an unrestricted ability to remove or undertake works to trees subject to a tree preservation order without appropriate safeguards. Article 41 is required to ensure that a tree preservation order made after the date of the DCO does not prevent the delivery of the authorised development in accordance with the powers and controls granted by the DCO. This does not mean that works to protected trees may be undertaken without appropriate arboricultural and environmental controls. The approach to include provisions regarding trees subject to tree preservation orders has precedent in the Cleve Hill Solar Park Order 2020, the Longfield Solar Farm Order 2023, the Gate Burton Energy Park Order 2024, the Tillbridge Solar Order 2025, the

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
			Fenwick Solar Farm Order 2026 and the Springwell Solar Farm Order 2026. Requirement 12 requires a detailed CEMP to be submitted to and approved by the relevant planning authority, in consultation with, amongst others, Lincolnshire County Council, before commencement of the relevant part of the authorised development. The detailed CEMP must be substantially in accordance with the Outline CEMP [REP1-061] and must be implemented as approved. The Outline CEMP provides that, should a requirement for additional tree works be identified, this must be discussed with the Project Arboriculturist and no such works may be undertaken without the prior consent of the relevant local planning authority. It also requires a pre-construction tree survey and an Arboricultural Method Statement, including a final Tree Protection Plan and updated assessment of arboricultural impacts associated with the detailed design. The Outline CEMP also secures landscape and biodiversity management and enhancement measures, including replacement planting.

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
			Accordingly, works to trees which become subject to a tree preservation order after the date of the DCO remain subject to the arboricultural and environmental controls secured through Requirement 12 and the detailed CEMP. The Applicant therefore considers that appropriate safeguards are already secured through the DCO and does not consider that additional provisions on the face of Article 41 are necessary.
16.7	Part 6 (Miscellaneous and General): Article 47 Procedure in relation to certain approvals etc	The proposed six week timeframe for the determination of any consent or, agreement or approvals is considered to be too short.	The Applicant does not consider that an amendment to Article 47 is necessary. Article 47(4) provides a six-week period for the determination of relevant applications or requests, but expressly allows a longer period to be agreed in writing between the undertaker and the relevant consenting authority. The six-week period therefore provides a clear default timeframe for determination while retaining flexibility for a longer period to be agreed where appropriate having regard to the particular application or request. The Applicant considers that this provides an appropriate balance between the timely determination of applications and allowing additional time where this is reasonably required.

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
			As set out in the Explanatory Memorandum [REP1-008], this Article has precedent in the Longfield Solar Farm Order 2023, the Gate Burton Energy Park Order 2024, the West Burton Solar Project Order 2025, the Tillbridge Solar Order 2025, the Fenwick Solar Farm Order 2026 and the Springwell Solar Farm Order 2026 and is considered appropriate and justified in order to ensure that the Authorised Development can proceed in a reasonable timescale, and so that there is a consistent approach to consents that must be sought by the undertaker pursuant to the Order. The Applicant therefore considers the existing drafting of Article 47 to be appropriate.
16.8	Schedule 2 (Requirements): Requirement 2 Commencement of the authorised development	The proposed 7 year implementation period is considered to be long, a more typical implementation period for a DCO would be 5 years and there are numerous examples of solar developments in Lincolnshire where this is the case. The Council is concerned that it would leave uncertainty to landowners, an increased risk that the Environmental baseline conditions may change over time, as well as local and national policy and local considerations. The Applicant's justification for the proposed duration is set out in The Explanatory	The Applicant notes the Council's comments but considers that the seven-year commencement period in Requirement 2 remains appropriate and justified in the particular circumstances of the Scheme. As explained in the Explanatory Memorandum [REP-008], the commencement period reflects the uncertainty associated with the ongoing NESO grid connection reforms and the timing of a firm Gate 2 connection offer. The timing of the confirmed grid connection date is outside the Applicant's control and

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
		Memorandum [APP-029] and relates to the uncertainty around grid connection. See the Council's comments under section 8 of this report regarding this matter.	remains subject to change. The seven-year period therefore provides appropriate flexibility to accommodate these external dependencies and is not without precedent, with a seven-year commencement period having been accepted for the Cory Decarbonisation Project Order 2025. The Applicant does not consider that the seven-year commencement period results in the environmental controls applying to the Scheme becoming ineffective. The DCO Requirements secure a range of detailed plans, surveys and mitigation measures which must be prepared and/or approved prior to commencement of the relevant part of the authorised development. These mechanisms ensure up to date environmental conditions and mitigation requirements to be considered at the appropriate stage prior to construction. The Applicant acknowledges the Council's concern regarding the period of uncertainty for affected landowners. However, this must be balanced against the need for a commencement period which reflects the particular external dependencies affecting delivery of the Scheme. The Applicant also notes that the statutory blight regime provides a mechanism by which

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
			qualifying landowners whose interests are affected by the Scheme may, where the relevant statutory criteria are satisfied, serve a blight notice requiring the acquisition of their interest, rather than having to await the exercise of compulsory acquisition powers by the Applicant. However, the potential period of uncertainty must be balanced against the need for a commencement period which reflects the particular external dependencies affecting delivery of the Scheme. In the circumstances, reducing the commencement period to five years could prejudice delivery of the Scheme for reasons outside the Applicant's control. The Applicant therefore does not consider that an amendment to Requirement 2 is necessary.
16.9	Schedule 2 (Requirements): Requirement 17 Public Rights of Way	The Council request that the wording is amended so that it captures all PRow that would be impacted by the development through closure, diversion, use of motor vehicles or other temporary management measures.	The Applicant considers that the existing wording of Requirement 17 already addresses the Council's concern. Requirement 17 applies to any sections of public rights of way shown in Schedule 6 (streets and public rights of way) as being temporarily closed or managed. The reference to public rights of way being "managed" is not limited to closures and is intended to capture other temporary management measures required in

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
			connection with the Scheme, including where relevant diversions and interactions with construction vehicles. Requirement 17 requires a Public Rights of Way Management Plan for those sections to be submitted to and approved by the relevant planning authority, in consultation with the relevant highway authority, before commencement of the relevant part of the authorised development. The Public Rights of Way Management Plan must be substantially in accordance with the oPRoW-MP [AS-026] and must be implemented as approved and maintained throughout the construction, operation and decommissioning of the relevant part of the authorised development. The Applicant therefore considers that Requirement 17 already captures public rights of way subject to the types of temporary management measures identified by the Council and does not consider that an amendment to the Requirement is necessary.
16.10	Schedule 2 (Requirements): Requirement 21	LCC suggest that an additional clause is provided for a) how a period of extended outage would be managed (if not dealt with through the management plans) and b) funding for decommissioning both as a result of an extended period of outage and at the	The Applicant notes the Council's comments. Requirement 21 secures the decommissioning and restoration of the Scheme. It requires a Decommissioning Environmental Management Plan to be submitted to and approved by the relevant planning

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
	Decommissioning and restoration	end of the lifespan of the development – see Section 21 above.	authority, in consultation with the Environment Agency and Lincolnshire County Council, no later than 12 months before the intended decommissioning of the relevant part of the Scheme. The plan must be substantially in accordance with the Outline Decommissioning Environmental Management Plan [REP1-065] and implemented as approved. Requirement 21 also requires decommissioning to commence no later than 40 years following final commissioning. In relation to periods of extended outage, the Applicant does not consider that a period during which the Scheme, or part of it, is temporarily non-operational should necessarily trigger decommissioning. An extended outage would not, in itself, mean that the Scheme has reached the end of its operational life or is no longer intended to return to operation. In relation to decommissioning funding, Requirement 21 places an obligation on the undertaker to decommission the Scheme in accordance with an approved Decommissioning Environmental Management Plan and within the timeframe specified in the Requirement. The Applicant does not consider

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
			that a separate financial security mechanism is necessary to secure compliance with those obligations. Accordingly, the Applicant considers that Requirement 21 provides an appropriate mechanism for securing the decommissioning and restoration of the Scheme and does not consider that the additional provisions requested by the Council are necessary.
16.11	Schedule 2 (Requirements): Requirements 3 (Approved details and amendments to them), 5 (detailed design approval), 7 Landscape and Ecological Management Plan, 8	The Council would wish to be a consultee on these requirements as any approvals given may affect previous approvals given by this Council in respect of other requirements and/or where the Authority has a statutory responsibility such as Highways.	The Applicant notes the Council's request. The draft DCO identifies the appropriate determining and consultation authorities for each Requirement having regard to the subject matter of the relevant approval. In respect of Requirement 21 (decommissioning and restoration), LCC is already expressly identified as a consultee. Requirements 3, 5, 7, 8 and 20 are to be discharged by South Holland District Council as the relevant planning authority. The Applicant does not consider it necessary for Lincolnshire County Council to be specified as a consultee in respect of each of those Requirements irrespective of the subject matter of the application for approval. Where a matter requiring a separate approval or consultation with Lincolnshire County Council is engaged, including in its capacity as highway authority,

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
	Biodiversity net gain, 20 Skills, supply chain and employment, 21 Decommissioning and restoration		the relevant controls elsewhere in the DCO, including for example its approval powers contained within the streetworks articles, will continue to apply.
16.12	New Requirement - Grid Connection	For reasons set out in section 8 of this report the Council would wish to see a requirement restricting commencement of the development (including permitted preliminary works) until such time that planning consent has been granted for the Weston Marsh substation or such alternative connection identified .	As outlined in detail at Row [2.2] above, the Applicant does not consider that the proposed restriction is necessary or proportionate. The Applicant does not propose to amend the draft DCO in this respect.
16.13	Schedule 14 Procedure for discharge of requirements	Applications made under requirement 2 (2) – the six week approval timeframe is considered to be too short. The Council request that this is extended 13 weeks which would be more consistent with other solar DCO's that have approved longer timeframes such as Cottam Solar and also the requested timeframe for approvals of other consent under article 47. Further information and consultation 3	The Applicant does not consider the amendment requested to the six-week determination period to be necessary. The six-week determination period provides an appropriate timeframe for the discharge of requirements, while paragraph 2(2)(c) expressly allows a longer period to be agreed in writing between the undertaker and the relevant planning authority where

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
		(3) The period of 15 working days where consultation is required with relevant consultees is considered to be too short. The Council request that this is amended to 20 working days to allow the relevant consultee sufficient time to review the submission details and respond to the relevant authority.	required. The Applicant therefore does not propose to amend this aspect of Schedule 14. In relation to paragraph 3(3), the Applicant acknowledges LCC's request to increase the consultation period from 15 to 20 working days. The Applicant is content to provide a 20-working day consultation period and will update the Draft DCO at Deadline 3 accordingly. The Applicant therefore proposes to amend paragraph 3(3) only and otherwise retain the existing provisions of Schedule 14.
16.14	Schedule 15 Part 5 Fees	The Council is of the view that the proposed fee structure would not adequately cover the Council's reasonable costs in fulfilling its administrative obligations. It recommends adopting the fee structure used in several recent Lincolnshire NSIPs, which incorporates an increase aligned with the national planning fee rise introduced in April 2025. The most current examples of such a structure can be found in the DCO for One Earth Solar. It is also considered that the first application at the higher fee rate should apply to each of the requirements in schedule 2. Assume this is what this covers from One Earth (3) Where an application under sub-	The Applicant will submit an updated version of the draft DCO at Deadline 3 to reflect the Council's comments, including updating the applicable fees and providing for those fees to be adjusted in line with the relevant national planning fee increases. The higher first application fee has also been applied to each of the relevant requirements in Schedule 2.

Reference	DCO Article/Part/Schedule	Matter Raised	Applicant's Response
		paragraph (1) is made and a fee payable on or after 1 April 2025, then section 18A of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (as amended by the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Amendment Regulations 2023) will apply as modified by this Order, so that "the relevant amount" means the fee payable under subparagraph (2)(a), (2)(b) or (2)(c) above.	
16.15	Schedule XX	There is currently no agreed Protective Provision for The Protection of Lincolnshire Fire and Rescue included within the DCO, as referred to in Section 20 above.	The Applicant confirms that it agrees to the protective provisions for the benefit of Lincolnshire Fire and Rescue as appended to the LCC's Local Impact Report and will incorporate these provisions into the Draft DCO submitted at Deadline 3.

3.17. Appendix i: Report by AAH Landscape and Visual Impact Assessment (LVIA) – July 2026

Table 3-17 AAH LVIA Comments

Reference	Topic	Matter Raised	Applicant's Response
17.1	LVIA Chapter	The LVIA clearly draws a distinction between landscape effects and visual effects, with the main chapter focussing on likely 'Significant' effects.	Noted.

Reference	Topic	Matter Raised	Applicant's Response
		Paragraph 12.4.36 of the LVIA clarifies that "Residual effects found to be 'moderate' or 'major' are deemed to be 'significant' and may be important or relevant to the decision-making process. Effects found to be 'negligible', or 'minor' are considered to be 'not significant' and may not be important or relevant to the decision-making process". This is acceptable, and provides a clear and transparent threshold to identifying Significant landscape and visual effects.	
17.2		Paragraph 12.4.37 clarifies that the professional judgement of competent experts is applied to assessments throughout the LVIA, including the assessment of significance of effect by combining sensitivity of receptor and magnitude of impact (change). This is promoted within GLVIA3, which states that this is not a prescriptive process and that tables and matrices are provided as a guide to how combinations of sensitivity and magnitude are typically combined. In this LVIA, reasoned explanations of judgements made on effect significance are based on consideration of the factors set out in ES Appendix 12-2 (Doc Ref. 6.2) as an indicative framework. However, conclusions of significance may differ from those in the table when supported by evidence." It is important that	The LVIA methodology in ES Appendix 12-2: LVIA Methodology [APP-236] establishes the structured framework for determining receptor sensitivity, magnitude of change and significance of effect, while recognising, in accordance with GLVIA3, the role of professional judgement. Professional judgement is applied with reference to the defined assessment criteria and relevant factors rather than through mechanistic application of the indicative matrix. The main LVIA chapter (ES Chapter 12 [APP-063]) and detailed assessment appendices provide the receptor-specific reasoning supporting the reported judgements. Where a significance judgement differs from that indicated by the framework, the conclusion is based on the particular circumstances

Reference	Topic	Matter Raised	Applicant's Response
		the application of this professional judgement is explained and transparent throughout especially where there are variations from the indicative framework.	of the receptor and the relevant assessment factors, with the reasoning provided within the assessment.
17.3		Vegetation removal is mentioned at Construction (12.8.9) and Decommissioning (12.8.39) and is shown in Figures 2.12 Hedgerow Regulations and Tree Preservation Order Plan – Section A and B. However, at this stage, there is little detail. Chapter 9 Ecology and Biodiversity provide more information (P83) but is also light on detail. Appendix 12-8 Arboriculture Impact Assessment (parts 1 and 2) also contains information with Annex B Tree Constraints plans Sheets 1-30 showing trees and hedging impacted by the development. Perhaps due to these multiple sources of information, it remains difficult to understand how much existing hedgerow will be removed and reinstated (in linear metres) and the suggestion is that few Ancient / Veteran trees or woodland will be impacted by the proposals. However, if proposed mitigation areas and existing retained vegetation proposals are changed in later, detailed design stages, the findings of the LVIA and other supporting documents are also likely to change. Landscape mitigation, and vegetation	Information regarding the extent of habitat changes is provided in the Biodiversity Net Gain Report [REP1-059]. The LVIA is based on the defined Scheme parameters and embedded mitigation, including retention of existing vegetation where practicable and offsets from vegetation boundaries, as illustrated within Annex A of the OLEMP [REP1-070]. Detailed landscape implementation and management will be secured through the detailed LEMP in substantial accordance with the OLEMP [REP1-070] as set out within Requirement 7 of the Draft DCO [REP1-006]. Any detailed design must remain within the assessed parameters and secured mitigation on which the ES conclusions rely. ES Appendix 12-8: Arboricultural Impact Assessment Report [APP-242] is clear that there are no ancient woodland within or near to the Order Limits and that no veteran or ancient trees will be removed to facilitate the Scheme and this commitment is secured via the OCEMP [REP1-061]. Tree and hedgerow loss is addressed in terms of canopy cover (m²) within section 7.3 of ES Appendix

Reference	Topic	Matter Raised	Applicant's Response
		retention and protection, needs to be clarified in the associated LEMP and secured through the DCO as the assessment relies heavily upon it to reduce the residual landscape and visual effects of the Development.	12-8: Arboricultural Impact Assessment [APP-242]. Tree and hedgerow loss is shown spatially on the Tree Protection Plan included as Annex C of the report [APP-242 and APP-243].
17.4	LVIA Figures	The Figures are clearly listed within section 12.1.3 of the LVIA, and are referenced throughout the report to support and illustrate the findings. The Figures produced as part of the LVIA are mostly appropriate in the level of detail provided and clarity of information presented. However, Figure 12-3 Public Rights of Way and National Cycle Network would benefit from the identifying long-distance routes such as the MacMillan Way. At this stage, the Figures 12-21 and 12-22 (Photo sheets) do not show AVRs (Accurate Visual Representations) of the proposed development including BESS, substations, pylons, inter array and solar arrays. Wireframe outlines and extent of development is presently indicated (type 1). The Viewpoints selected to show AVRs, including photomontage (type 3) have not yet been identified.	ES Figure 12-3 [APP-113] identifies the PRoW and National Cycle Network considered by the LVIA; long-distance routes, including the Macmillan Way, are also specifically identified in the recreational receptor assessment. However, for further clarity, an updated ES Figure 12-3 (Doc Ref. 6.2 Rev 1) has been provided at Deadline 2 to name the National Cycle Network and the route of the MacMillan Way. ES Figures 12-21 Photosheets [APP-131 to APP-142] and 12-22 LCC Photosheets [APP-143 to APP-146] include both Type 1 and Type 3 visualisations prepared in accordance with TGN 06/19. The Type of visualisation is clearly stated on each photosheet. The split between Type 1 and Type 3 visualisations, and the representative viewpoint locations, was discussed and was understood by the Applicant to have been agreed with LCC and SHDC during pre-application engagement prior to completion of the assessment as detailed in ES Chapter 12 Landscape and Visual [APP-063].

Reference	Topic	Matter Raised	Applicant's Response
17.5	Methodology	AAH have not identified anything on Site that would contradict the statement that there would not be Significant effects beyond 5km (Solar Development Area, Inter-Array) or 10km (Grid Connection Route) and typically distance reduces the likelihood of this occurring. However, it is noted that during consultation, South Holland District Council requested that viewpoints in the 10-15km range should be added to demonstrate how the tallest elements of the Scheme relate to distant sensitive receptors, and these should specifically cover the intervisibility between the Grid Connection route and Boston Borough Council area. It is also the case that during the construction phase (and potentially operation with maintenance and replacement operations) traffic movement to and from the Site may have effects beyond 5km.	The LVIA study areas were developed to provide a proportionate assessment focused on receptors where significant effects could reasonably occur. Additional viewpoints in the Boston Borough Council area requested through stakeholder consultations were incorporated, including longer-distance viewpoints (refer to Viewpoints 28 & 29). Construction traffic effects are addressed through the relevant ES topic chapters; the LVIA assesses the landscape and visual effects of the Scheme at construction within the defined study areas.
17.6		Given the stated operational time of 40 years (6.1 Chapter 2; The Scheme), it is clear that this is a long-term project. We would recommend that the applicant consider fully that within this 40-year timescale, the panels, inverters, batteries and other associated elements may well need replacing. Given the pace of developments in technology, the panels could be replaced on numerous occasions.	The LVIA operational assessment expressly recognises that activities may include vegetation management, equipment servicing, maintenance, replacement and periodic inspection/monitoring. Individual replacement events cannot reasonably be predicted over the 40-year operational period and have therefore not been assessed as separate construction phases. Such activities would be

Reference	Topic	Matter Raised	Applicant's Response
		At this stage we would need additional information regarding the phases of replacements in order to consider whether there is one single construction stage, or a series of staged re-construction stages, and activity and deliveries, potentially of large-scale equipment, be for the life of the scheme.	temporary, intermittent and localised within the context of the operational Scheme and would not alter its established form, scale or overall landscape and visual conclusions. Nor would these activities exceed the scale of works that would occur during the construction phase which is assessed within ES Chapter 12: Landscape and Visual [APP-063].
17.7		Perhaps because these published character areas are numerous, and aligned with guidance within GLVIA3, no site-specific assessment has been carried out by the author as part of the LVIA. Consequently, AAH believes that details about the context of the Site may have been overlooked. As the smaller field sizes, and variations in settlement described above suggest, there are variations in vegetation cover across the site and its surroundings. As described in 12.6.87 and 12.8.48 later in the LVIA, the majority of residential properties are surrounded by vegetation, and the area around Whaplode and Gedney Hill is generally more vegetated. The smaller fields described are also more likely to be edged by hedgerow and field trees adjacent to settlement and isolated farm houses. Consequently, we would argue that there is more scope for mitigation with hedge and tree planting in some locations, such as	The Applicant does not agree that site-specific context has been overlooked. The LVIA baseline describes the Site's topography, hydrology, vegetation, settlement and land use, tranquillity and visual context, including the smaller-scale and more vegetated landscape around Whaplode Drove and Gedney Hill. These characteristics informed both the assessment and the mitigation strategy. Targeted planting has been incorporated within the OLEMP [REP1-070], where appropriate, while avoiding extensive planting that would itself erode the characteristic openness of the Fenland landscape.

Reference	Topic	Matter Raised	Applicant's Response
		at the overhead Inter-Array condition near Whaplode and Gedney Hill.	
17.8		The future baseline is described in 12.6.105 and 12.6.106 of the LVIA. The development of further solar farm projects development is not considered. This should be corrected as this is a landscape undergoing extensive change to land-use to meet national renewable energy aspirations and housing needs. The landscape is set to change from one dominated by agriculture to one containing large scale solar development and other land uses. Appendix 4-1: List of Cumulative Schemes (Doc Ref: 6.3) and Figure 15-6: Cumulative Schemes show the short list of cumulative developments that have been considered. It would be helpful if Figure 15-6 named the projects rather than relying on their applications numbers. The cumulative projects listed include the national grid upgrade projects Eastern Green Links 3 and 4 and Grimsby to Walpole and other renewable energy projects including Ossian Wind Farm, Mallard Pass Solar Project and Boston Alternative Energy Facility. Subsequently, we have concerns regarding effects on the regional landscape character and pressures from renewables development at an unprecedented scale. The mass and scale of these	In accordance with the EIA Regulations, the future baseline in ES Chapter 12: Landscape and Visual [APP-063] provides a concise description of the likely evolution of landscape character and visual amenity in the absence of the Scheme, including planned growth identified in the South East Lincolnshire Local Plan. While it does not specifically identify the wider programme of proposed energy infrastructure, it notes that <i>"built development within the study area would increase"</i>. The wider programme of committed and reasonably foreseeable renewable energy and grid infrastructure is considered through ES Appendix 12-7: Landscape and Visual Cumulative Assessment [APP-241], including combined and sequential effects. The future baseline and cumulative assessment should therefore be read together. ES Figure 4-1 Short List of Cumulative Schemes [APP-086] shows all cumulative schemes within 30km and should be read in conjunction with ES Appendix 4-1: List of Cumulative Schemes [APP-170]. This approach provides a consistent and unambiguous means of identifying each cumulative

Reference	Topic	Matter Raised	Applicant's Response
		identified and potential projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and likely regional area, will be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is currently predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing multiple schemes across potentially several kilometres, albeit with gaps between some of the projects. However repeated views and presence of large-scale energy infrastructure, wind and solar projects would combine over time, resulting in a greater perception of change.	scheme and enables the schemes shown on the figures to be readily cross-referenced. The use of application reference numbers also avoids potential ambiguity arising from project names, which may change during the planning and consenting process or may be used differently by different project promoters and stakeholders. Additionally, the application numbers are also clearly referenced in ES Appendix 12-7: Landscape and Visual Cumulative Assessment [APP-241]. However, NSIP schemes within 5km do have both their name and application number shown on ES Figure 4-2 Short List of Cumulative Schemes within 5km radius [APP-087].
17.9		To calibrate this change to the landscape, these schemes combined, if built, would clearly require the update of any published landscape character assessment, including at a national level (NCA's), so as to include large scale renewable energy generation as a defining land use characteristic as well as agriculture. This is a clear and marked change to landscape character, and several	The Applicant notes the observation.

Reference	Topic	Matter Raised	Applicant's Response
		schemes have already been approved, with many in the planning system.	
17.10		This baseline process, undertaken by the applicant, resulted in several landscape receptors for the assessment of effects on them by the Development. These are presented in Table 12-5 (p89 of the LVIA). Disappointingly, these are limited to district and local level character areas. As described in Impact Assessment Methodology 12.4.13 to 12.4.17, AAH's expectation would be that landscape receptors are identified at a range of scales and consider character, fabric and designations. AAH believe that features of the fabric of the landscape like trees and hedgerows, agricultural land use and perceptual landscape receptors like 'seasonality' are less well considered in the assessment (Landscape receptors can include 'constituent elements of the landscape' and 'specific perceptual qualities' P36 – GVLA3). Consequently, the impact of the Development on these landscape receptors is under represented with the focus of the assessment on taller vertical structures with less consideration of the impact of the Solar Development Areas.	The Applicant does not agree that agricultural land use, openness and seasonality have been omitted from the assessment. These are considered as characteristics and perceptual qualities of the relevant landscape character receptors, rather than as separate landscape receptors. ES Appendix 12-4: Landscape Assessment [APP-238] identifies the landscape as predominantly agricultural and expressly considers its open character, long-range views, large skies, field pattern and limited vertical vegetation when determining susceptibility and effects. For the Eastern Fens HLCZ, which contains Solar Development Area Parcels A–D, agriculture is specifically identified as a defining land use and openness as a characteristic influencing susceptibility to the Scheme. The assessment subsequently considers the change from arable land to renewable energy generation and expressly identifies effects on the key characteristic of openness. Seasonal conditions are also incorporated into the assessment, with construction, Year 1 operation and decommissioning assessed under winter conditions
17.11		The proposed solar arrays will fundamentally alter the character and appearance of the landscape by	

Reference	Topic	Matter Raised	Applicant's Response
		replacing large areas of open agricultural land with solar energy infrastructure. Agricultural land varies in appearance throughout the year, and this seasonality is an essential part of its character, which is not considered in the assessment. Features and attributes of the land like this are not identified by the assessment as landscape receptors and so the impact of the development on them is not assessed. Another landscape attribute that is not assessed as a landscape receptor is 'openness' which will also be compromised by the extensive coverage and appearance of these arrays. Seasonality and openness should therefore be assessed as separate landscape receptors in the assessment.	and Year 15 under summer conditions. The visual assessment additionally considers seasonal differences in vegetation and visibility where relevant. Representative viewpoint photography was undertaken in both summer and winter conditions, with additional winter photography submitted at Deadline 1 within the Additional Winter Photography Technical Note [REP1-079], providing further consideration of seasonal variation in baseline visibility. The Applicant therefore considers that agricultural land use, openness and seasonal variation have been appropriately considered within the LVIA and do not require assessment as separate landscape receptors.
17.12		Table 12-5 summarises the assessment of Landscape Value, Susceptibility and subsequently Sensitivity of all identified receptors which are limited to only district character areas.	Table 12-5 summarises the principal landscape character receptors taken forward for assessment. However, the assessment is not limited to the character area designations themselves. ES Appendix 12-3: Landscape Baseline [APP-237] provides a detailed site-specific baseline covering landscape characteristics including topography, land use, field pattern, vegetation, openness and tranquillity. ES Appendix 12-4: Landscape Assessment [APP-238] then assesses effects on

Reference	Topic	Matter Raised	Applicant's Response
			landscape character and associated landscape elements, informed by these constituent characteristics. The Applicant therefore considers that the character areas/zones provide an appropriate framework within which effects on their constituent landscape characteristics and qualities are assessed.
17.13	Landscape Assessment	The following effects upon identified landscape receptors are identified in the LVIA: • At Construction the following receptors were assessed as having the following significant landscape effects: o Moderate adverse: Significant for: ▪ The Fens (HLCA9) ▪ The Wash (HLCA 10) ▪ Fen 2 – The Eastern Fens ▪ WSH 6 - Townlands • At Operation (Year 1) the following receptors were assessed as having the following significant landscape effects: o Moderate adverse effects: Significant for: ▪ The Fens (HLCA9) ▪ The Wash (HLCA 10) ▪ Fen 2 – The Eastern Fens ▪ WSH 6 - Townlands • At Operation (Year 15) the following receptors were assessed as having the following significant landscape effects: o Moderate adverse effects: Significant for: ▪ The Fens (HLCA9) ▪ The Wash	Noted. These effects are consistent with the findings reported in the LVIA.

Reference	Topic	Matter Raised	Applicant's Response
		(HLCA 10) ▪ Fen 2 – The Eastern Fens ▪ WSH 6 – Townlands • At Decommissioning the following receptors were assessed as having the following significant landscape effects: - o Moderate adverse effects: Significant for: ▪ The Fens (HLCA9) ▪ The Wash (HLCA 10) ▪ Fen 2 – The Eastern Fens ▪ WSH 6 – Townlands	
17.14		These direct 'Significant' effects at Construction, Operation (Year 1) are due to the "partial degradation of the key characteristics of these HLCAs / HLCZs through temporary loss of arable land and erection of features on skylines, changing partially the key characteristic of 'openness' (12.8.13). It is also noted that "no mitigation planting is proposed for the overhead lines in the Overhead Inter-Array Connection and the Grid connection route" (p117 LVIA). At Operation (Year 15), mitigation planting around the Solar Development Areas would have established and this will enhance and extend vegetation patterns along field boundaries and watercourse. This will increase vegetation in all of these HLCAs / HLCZs reducing some of the perceived 'openness'.	Noted. This is consistent with the LVIA findings.

Reference	Topic	Matter Raised	Applicant's Response
17.15		AAH would question whether the "no mitigation" approach is justified for the Overhead Inter-Array Connection which is located near Whaplode and Gedney Hill where there is more development and associated planting. The Inter-Array Overhead Lines (OHL) will be at a height of 15m in a location adjacent to settlement characterised by garden and field hedge vegetation (12.6.67). Tree heights at maturity can be 20m plus so in the long term they may have a beneficial effect that is in keeping with Landscape character.	The Applicant wishes to clarify that the Inter-Array Overhead Lines (OHL) will be at a height of up to 15m. The final height will be subject to detailed design. For the purpose of assessment, a precautionary approach is adopted and the height is assumed to be 15m. The reference to no mitigation should be understood principally in relation to the Overhead Inter-Array Connection and does not mean that no landscape mitigation is incorporated in the surrounding area. The LVIA recognises that existing overhead line infrastructure similar in scale forms part of the local landscape and visual character and assesses the Overhead Inter-Array Connection as therefore not uncharacteristic of the locality, although it would increase the prominence of such infrastructure. While vegetation is locally more prevalent around settlements, the wider landscape remains characterised by sparse vegetation and open views. Introducing substantial tree planting specifically to screen the 15 m poles would therefore create additional enclosure and landscape change for sensitive receptor groups.
17.16		It is also questioned whether a complete 'no mitigation' approach is appropriate for the Grid Connection route as well. It is accepted that as the	The Applicant notes that 400 kV pylons cannot realistically be screened by planting because of their height and scale. Routing, siting and design have

Reference	Topic	Matter Raised	Applicant's Response
		pylons will be up to 66m, it will not be possible to hide them from view to protect landscape character, but breaking up outlines and filling skylines adjacent to these structures so they do not stand out in isolation may be preferable. While vegetation is sparse, there are localised and isolated blocks of woodland and field edge trees especially adjacent to watercourses including river and ditches. Certainly, the proposed 400kV substation and BESS facilities should be planted to break up the outline of the structures. Obviously, a balance needs to be found so that the character of 'openness' prevails.	therefore been the principal means of reducing effects. Targeted planting is incorporated around lower-level infrastructure, including the On-Site Substation/BESS and Cable Sealing End Compounds, where it can provide effective integration, as shown in Annex A of the OLEMP [REP1-070]. Extensive planting along the Grid Connection Route would risk introducing uncharacteristic enclosure into the open Fenland landscape.
17.17		Regarding Decommissioning, it is clarified in Section 12.8.38 of the LVIA, 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. AAH are happy with this approach, from a landscape perspective, as long as any existing planting disturbed by these operations is reinstated. A commitment to do this should be included in the LEMP.	The Applicant is in the process of reviewing this request and will provide an update as part of the Statement of Common Ground with LCC at Deadline 3.

Reference	Topic	Matter Raised	Applicant's Response
17.18	Visualisations and Photomontages	At the time of writing, viewpoints with Type 3 (photomontages) visualisations have yet to be completed / included. The proposal plans remain 'indicative' (APP-074 and APP-076). The Photo sheets reviewed seemed only to show development extents and wireframe outlines. There were no close view photomontage images of the proposed substations which remains a significant omission and no images reviewed seemed to accurately show the appearance of the Solar Development Areas. This continues to makes it difficult to assess the true visual impact of the development.	This comment does not reflect the submitted ES. ES Figures 12-21 Photosheets [APP-131–142] and 12-22 LCC Photosheets [APP-143–146] include Type 1 and Type 3 visualisations prepared in accordance with TGN 06/19. The balance of Type 1 and Type 3 visualisations and the representative viewpoints was agreed with LCC and SHDC. The Type 3 visualisations accurately position and scale the Scheme based on the parameters assessed in the ES. Where detailed design information was not available, including for the proposed substations, the visualisations represent the assessed maximum parameters and massing rather than detailed architectural appearance. This is consistent with the parameter-based approach to the DCO Application. The LVIA assesses all Scheme elements on this basis using the maximum parameters defined in ES Chapter 2: The Scheme [AS-017].
17.19	Visual Assessment	The Development is assessed as resulting in a Significant change to the same visual receptors at all stages from construction through to decommissioning, with the effects also remaining unchanged. The receptors affected and the significance of the effects on them remains mostly unchanged for the 40-year life of the	The Applicant does not agree that the visual assessment assumes effects remain unchanged throughout the Scheme lifetime. ES Appendix 12-6: Visual Assessment [APP-240] assesses construction, Year 1, Year 15 and decommissioning separately, recognising the different nature and duration of effects at each stage and the

Reference	Topic	Matter Raised	Applicant's Response
		Development. There is very little explanation in the LVIA for this conclusion which feels simplistic. Development activities at Construction will be very different from those experienced at Operation. AAH would expect to see a change in effect in some of the receptors throughout the design life of the project. This simplification seems to come from an acceptance by the applicant that mitigation will have limited visual impact and so it is not proposed. AAH would reiterate that localised and targeted mitigation to reduce the visual impact of proposed structures will be of value and can be achieved in a way that is compatible with existing landscape character if a balanced approach is taken.	establishment of mitigation planting over time. For a number of viewpoints, the magnitude and/or significance of visual effects reduces as mitigation establishes. For other receptors, the significance category remains unchanged because, notwithstanding established planting, the scale and visibility of the Scheme remain sufficient to result in the same level of significance. This does not mean that the nature or extent of the effect is unchanged. The assessment also recognises that established mitigation planting would be retained and provide screening during decommissioning. The Applicant therefore considers that the assessment appropriately differentiates effects over the Scheme lifetime and does not accept that the findings result from an assumption that mitigation would have limited visual effect. The Applicant's approach to targeted landscape mitigation is addressed in the responses above.
17.20		Appendix 12-6 Visual Assessment (Table 1-1) provides a detailed explanation of the assessment values and is considered reasonable. However, it is noted that the viewpoints assessed as experiencing 'moderate' adverse effects are all	The substations and BESS have been assessed using the maximum parameters defined in ES Chapter 2 The Scheme [AS-017], supported by dedicated ZTV analysis and representative viewpoints. The significance of an effect is not determined by the

Reference	Topic	Matter Raised	Applicant's Response
		located adjacent to the three proposed 132KV substations, and that the 400 kV substation / BESS compound and Weston Marsh B Substations, which will be much larger structures, do not seem to generate Major adverse (significant) effects on the VPs adjacent to them. At this stage, this assumption seems unlikely, and more information to explain this is required.	size of an individual structure alone, but by receptor sensitivity and the magnitude of change within the particular view, including distance, screening, context and the proportion of the view affected. For example, where the On-Site 400 kV Substation and BESS Compound would be visible from LCC 2-1, the assessment recognises that these would become prominent elements, while also taking account of the retention of the wider open landscape, large skies and long-distance visibility. The resulting magnitude of change is assessed as Medium and the effect as Moderate Adverse (Significant). The LVIA therefore does not assume that proximity to, or the greater scale of, an individual substation must in itself result in a Major Adverse (Significant) effect.
17.21		It is also noted that few of the VPs assessed as having moderate or major effects are located on PROW with only CROW/7,11,12/1 and Wstn/3,6/1 mentioned. AAH believe that other PROWs are likely to experience significant effects including those along South Holland Main Drain and are surprised that there is no mention of the MacMillan way, Bridleways or the National Cycle	PRoW and recreational routes have been included as visual receptors within the LVIA. Table 12-8 with ES Chapter 12 Landscape and Visual [APP-063] identifies numerous footpaths, including those along the South Holland Main Drain, and bridleways, together with the National Cycle Network and Macmillan Way, generally as High-sensitivity

Reference	Topic	Matter Raised	Applicant's Response
		Route in the visual assessment. It is these key linear routes, many used recreationally, that need to be assessed adequately to establish where mitigation could be best utilised to reduce visual impacts.	receptors. The suggestion that these routes have not been considered is therefore incorrect. The visual assessment uses representative viewpoints to assess a range of receptors and sequential routes. The representative viewpoint selection was developed through pre-application engagement with LCC and SHDC, including the addition of viewpoints requested during these consultations. The Applicant considers that the viewpoint suite provides an appropriate basis for assessing effects on recreational receptors, including those using the wider PRoW network.
17.22		Specifically, the development is likely to have an adverse effect on the visual amenity of several key PROWs, Bridleways and Cycle Routes. VP3 is judged as experiencing a Major Adverse (significant) effect as views from this location will be elevated and the full extent of the solar arrays – fields A, B, C, the 132kV substations, and the 400kV substation / BESS will be visible from this location. Due to the prominence of this location and its use as a cycleway (NCN), bridleway and PROW, between Crowland and Spalding, along the River Welland, it will be important to develop a mitigation strategy specifically for this VP to minimise effects. A localised increase in tree-cover	The LVIA acknowledges a Major Adverse effect at VP3. Targeted mitigation is already proposed along the entire western side of Parcel A, comprising bands of shrubs and bands of shrubs with scattered trees, as illustrated in Annex A of the OLEMP [REP1-070]. This will increasingly filter views of the Solar Development Area. Complete screening has deliberately not been sought because it would remove the characteristic openness and long-distance views eastwards from the elevated embankment and would itself materially alter the visual character.

Reference	Topic	Matter Raised	Applicant's Response
		around the river edge, tree planting in field corners and adjacent to structures should be considered with mitigation effects on this view as a priority.	
17.23		Also of concern are the impacts of the Development on the PROW associated with South Holland Drain (Flee/8/1 and Flee/8/2) where once again targeted and localised mitigation may be required to reduce impacts. Flee/8/1 and Flee/8/2 are PROW that connect to an extensive and long-distance network of routes that extend as far as the coast and Kings Lynn, following the course of the South Holland Drain and the River Nene. To the west, this PROW extends as far as Eaugate Road (Moul/7/1) but it is possible to continue along the course of South Holland Drain as far as the A16 where there is an under pass that links to the cycleway (NCN) PROWs and Bridleways associated with the River Welland between Crowland and Spalding. AAH have concerns that impacts on this route and the receptors associated with it have not been fully considered in regards to both design of the Development and subsequent mitigation. In what may be an oversight, there are no VPs at this location, with only VPs LCC 06 and LCC 05 located further west located on South Holland Drain.	The South Holland Main Drain and associated bridleways have not been overlooked. The LVIA specifically identifies bridleways along the South Holland Main Drain as High-sensitivity recreational receptors and considers sequential recreational views through representative viewpoints. The viewpoint selection was developed and as understood by the Applicant to have been agreed through pre-application engagement with LCC and SHDC, including additional viewpoints requested by LCC added to the assessment. The Applicant therefore does not consider additional viewpoints necessary

Reference	Topic	Matter Raised	Applicant's Response
17.24	Summary	In summary, the LVIA is mostly transparent regarding the likely significant effects on the Visual environment, however, AAH have concerns that this assessment is not yet complete and does not adequately assess the impact of the Weston Marsh B substation and the proposed 400kV substation / BESS compound which are still under ongoing design development. There are also concerns that the impact of the development on South Holland drain, and the PROW associated with it, have been overlooked. Photomontages showing the solar arrays and more accurate representation of the proposed Substations in key viewpoints are required and should be agreed with the relevant Local Authorities.	The Applicant notes that AAH considers the LVIA largely transparent. The submitted assessment is complete and is based on the maximum Scheme parameters defined in ES Chapter 2 The Scheme [AS-017]. All Scheme elements, including the Solar Development Area, BESS, substations and overhead lines, have been assessed. Type 1 and Type 3 visualisations are provided in ES Figures 12-21 and 12-22 [APP-131 to APP-146] , with the balance and viewpoint selection, as understood by the Applicant to have been agreed, through pre-application engagement with LCC and SHDC. The South Holland Main Drain and associated PROW are also included as recreational receptors.
17.25	Cumulative Landscape and Visual Effects	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 '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.	Noted. This is consistent with the LVIA findings.

Reference	Topic	Matter Raised	Applicant's Response
17.26		It is also the case that overall cumulative effects (this development combined with other proposals) were found to potentially have moderate adverse (significant) effects for more sensitive receptors which included in Appendix 12-7 - P47, P50 – Residents, P55 – PROW, P68 Recreational receptors. Table 1-2 provides a detailed explanation of this assessment.	Noted. This is consistent with the LVIA findings.
17.27		No further mitigation is proposed to address these cumulative effects. However, AAH believes that the applicant should remain open to providing mitigation (onsite and offsite - possibly in conjunction with other developers) to reduce cumulative impacts.	As explained under 17.16, the Applicant notes that 400 kV pylons, where the cumulative effects occur, cannot realistically be screened by planting because of their height and scale. Routing, siting and design have therefore been the principal means of reducing effects. Targeted planting is incorporated around lower-level infrastructure, including the On-Site Substation/BESS and Cable Sealing End Compounds, where it can provide effective integration, as shown in Annex A of the OLEMP [REP1-070]. Extensive planting along the Grid Connection Route would risk introducing uncharacteristic enclosure into the open Fenland landscape. This also applies to any cumulative effects.
17.28		Cumulative impacts remain an evolving situation and AAH are concerned about potential adverse (significant) effects on the landscape caused by	The cumulative assessment reflects the committed and reasonably foreseeable schemes available at the time of the preparation of the ES and includes

Reference	Topic	Matter Raised	Applicant's Response
		multiple developments. It is suggested that mitigation proposals for the Meridian Solar proposals may need to evolve, as required, in response to other development as more is known. It is suggested by AAH that the cumulative assessment is updated during the application process and incorporates all foreseeable schemes with (APP084) Figure 4-1 and (APP241) Table 1-2 also updated as required.	relevant renewable energy and grid infrastructure within the Weston Marsh area. Should a new major development emerge that is sufficiently advanced and has the potential to materially affect the cumulative landscape and visual assessment, its relevance would be considered at that time. However, to date, the Applicant is not aware of any new or materially changed schemes since submission that would affect the conclusions of the landscape and visual assessment.
17.29	Residential Visual Amenity and Settlements	A description of the approach to RVAA is provided in Section 12.4 and 12.8.45. This highlights the setback 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".	Noted. This is consistent with the findings of the LVIA.
17.30		The LVIA concludes that an RVAA is not required for this project. However, looking at the number of VPs assessed as having significant effects, AAH would request further explanation to clarify this	The Applicant welcomes continued engagement regarding landscape mitigation. The Scheme already incorporates a landscape mitigation strategy within the Order Limits, including targeted planting in

Reference	Topic	Matter Raised	Applicant's Response
		conclusion. AAH agree that it is unlikely that properties will reach the Residential Visual Amenity Threshold (RVAT). However, after reviewing the proposed scheme, dwellings located on Cloot Drive / Wash Bank (Sheet 1), Chapel Hill / Eaugate Road, Green Bank / Back Bank (sheet 6), Langary Gate Road (Sheet 7. 8 and 9) are in close proximity to the Development and may benefit from localised mitigation to contain views. AAH look forward to working with the applicant to ensure that the landscape design proposals are robust from a landscape character and visual perspective.	proximity to a number of the locations identified, as set out within Section 4.2 of the OLEMP [REP1-070]. Any suggestions for further mitigation can be considered through the Examination, having regard to its effectiveness, landscape character and the extent of the Order Limits.
17.31	Evidence of Iterative Process	Paragraph 10.6.1 lists the design principles most relevant to landscape and visual matters. These are noted and positive principles, however the successful implementation of these principles is likely to be limited by the 'no mitigation approach' described in the LVIA (12.8.24). AAH would suggest that further work and explanation is required to show how these principles are to be implemented in a joined up and cohesive manner. It is not clear whether the proposed advanced planting described in 12.7.19 at Martins Road, Langary Gate Road and Field C-1-07 are intended to be interconnected as part of an overall strategy	The landscape mitigation strategy set out within the OLEMP [REP1-070] is a coordinated Scheme-wide approach rather than a series of unrelated responses. The reference to a 'no mitigation approach' relates principally to the overhead line elements and does not mean that landscape and visual mitigation has not been incorporated across the Scheme. The strategy combines retention of existing vegetation, offsets, habitat areas, advanced planting and residual mitigation planting in locations where these measures respond appropriately to landscape character and sensitive receptors.

Reference	Topic	Matter Raised	Applicant's Response
		or if they are localised and isolated responses to site issues, and so this needs to be clarified.	The advanced planting at Martins Road, Langary Gate Road and Field C-1-07 comprises targeted measures responding to particular visual receptor circumstances at that location. The advanced planting proposals connect to a wider planting scheme proposed along the eastern side of Martins Road.
17.32	Mitigation Measures	The success of the landscape mitigation to meet the objectives laid out in the management plan, to integrate and screen proposals, promote conservation and protection of the environment, and encourage ecological and habitat diversity, is highly dependent upon the successful management and maintenance of the new planting, as well as the protection of exiting trees and hedgerows. The maintenance operations provide an initial overview of operations; however, we would expect the management plan to be developed further, well beyond the initial 5-year period, particularly if landscape and visual effects are being assessed at 15 years. AAH hope that some long-term reduction in landscape and visual effects can be achieved in some locations for some receptors. To help achieve this, and the long-term success of the landscape mitigation, the management plan should cover at least 15 years,	The Applicant notes the comments. The OLEMP [REP1-070] provides for monitoring and management beyond the initial five-year establishment period and throughout the operational lifetime of the Scheme. This allows management requirements to respond to the condition and performance of the landscape mitigation over time. The detailed LEMP will include appropriate monitoring, maintenance and replacement requirements to support the continued establishment and effectiveness of planting, including where planting fails or requires replacement.

Reference	Topic	Matter Raised	Applicant's Response
		and should be in place and actively managed for the lifetime of the project. Similarly, any early planting (e.g. pre-construction advance planting outlines in 12.7.19) should be included in the maintenance plan.	
17.33		Monitoring of the proposals is a key aspect of the mitigation plan and is something which needs further development to ensure there is sufficient robustness to deal with the ever more challenging climatic conditions when it comes to establishing new planting. The updating of the management plans every 5 years after the initial 15-year establishment period will go some way to ensuring that it is kept valid and can respond to issues and trends effectively, such as climate change. Plant replacements should also be considered, and also for a longer period than a "standard" 5 years, and cover for scenarios where there are large areas that have not established, or areas of significant die back beyond a 5-year period.	The Applicant notes the comments. For clarity, the OLEMP [REP1-070]] provides for an initial five-year establishment period, rather than a 15-year establishment period, followed by ongoing monitoring and management throughout the operational lifetime of the Scheme. This allows management measures to respond to the condition and performance of planting over time, including plant failure or significant dieback. The detailed LEMP will set out the appropriate monitoring, maintenance and replacement requirements to ensure the continued effectiveness of the landscape mitigation.
17.34		While the submission includes landscape proposals, as shown in Annex A of the OLEMP, these are of a high level and it would be expected that if the project proceeds, more detailed plans would to be submitted and subsequently agreed with the appropriate consultee/authority prior to	The Applicant agrees with this approach. The OLEMP [REP1-070] establishes the landscape principles and outline proposals assessed in the ES. More detailed landscape proposals, including planting locations, species, density and specification, will be developed through the detailed LEMP, as

Reference	Topic	Matter Raised	Applicant's Response
		the commencement of any works, which would be secured as a Requirement of the DCO. This would include clear detail of the areas of landscape mitigation, location and types of planting (species), as well as number, density and specification.	secured through Requirement 7 of the Draft DCO [REP1-006], within the parameters and mitigation commitments assessed in the ES.
17.35		In section 5.4.7, replacement planting for failures is 'with matching' species. AAH would suggest that this is revised to 'appropriate' species so that there is some flexibility to assess the cause of failures through survey work and make changes species in response to drought, disease or other identified problem, since it is poor practice to keep replanting the same species without establishing the cause of failure.	The Applicant notes the suggestion. Replacement planting should use appropriate species, informed by the reason for failure and the objectives of the landscape mitigation, rather than necessarily requiring like-for-like replacement. The Applicant will review the wording for Deadline 3.
17.36		We accept that planting can be an effective way to screen development proposals and add valuable landscape and ecological elements into the landscape, however this needs to be carried out in a way that is sensitive to the existing landscape character, or meet any aims of a published character assessment to improve or introduce new planting to an area.	Noted. This principle underpins the landscape mitigation strategy set out within the OLEMP [REP1-070].
17.37		This is an open landscape, and planting to simply screen could have detrimental impacts. The PROW and local roads in the study area enjoy an open	Extensive planting introduced solely to screen the Scheme could itself adversely affect the characteristic openness of the Fenland landscape.

Reference	Topic	Matter Raised	Applicant's Response
		aspect across most areas of the Study Area. Therefore, care needs to be taken to prevent the loss of this character through an overbearing set of mitigation proposals. At present, an overly cautious 'no mitigation' approach seems to be the applicant's approach. It is noted that appropriate development offsets and careful design will go some way to improve the integration of the Development into the landscape.	This consideration is fundamental to the landscape mitigation strategy adopted for the Scheme. For clarity, the Scheme does not adopt a 'no mitigation' approach. Landscape and visual mitigation has been incorporated throughout the design process, including development offsets, retention of existing vegetation, siting and layout, habitat areas, advanced planting and targeted mitigation planting. References in the LVIA to no additional mitigation relate principally to the overhead line elements, where planting would not effectively screen infrastructure of this height and scale and could itself introduce uncharacteristic enclosure. The mitigation strategy therefore seeks to balance the integration and screening of the Scheme with the retention of characteristic openness and landscape pattern. Targeted planting is proposed where it can reinforce existing landscape features and reduce effects without introducing extensive or continuous screening that would itself alter landscape character.
Conclusions and Recommendations			
17.38		The Landscape and Visual Impact Assessment (LVIA) submitted as part of the DCO Application is	The Applicant notes AAH's overall conclusions and recommendations, including that the LVIA is

Reference	Topic	Matter Raised	Applicant's Response
	Summary and Conclusions on the LVIA	considered comprehensive, well-presented and generally undertaken in accordance with current best practice, notably GLVIA3 and LI TGN-2024-01. The LVIA is proportionate to the scale of the Development and has been prepared by competent experts. It identifies potential effects arising from construction, operation (Years 1 and 15) and decommissioning phases.	considered comprehensive, robust and proportionate, has been undertaken in accordance with current good practice, provides clear explanations of the assessment methodology and reaches reasonable conclusions. The Applicant also notes AAH's acknowledgement that the LVIA is transparent regarding significant landscape and visual effects and that the Scheme has generally been designed sensitively, using setbacks and targeted mitigation planting to respond to receptors and the open character of the landscape.
17.39		By reason of its mass and scale, the Development will lead to Significant adverse effects on landscape character and visual amenity at all main phases of the scheme (construction, operation year 1, operation year 15, decommissioning). The Development has the potential to transform the local landscape by altering its character on a large-scale across an extensive area. This landscape change also has the potential to affect a wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar arrays, substations, pylons and OHL, affecting the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area. We also judge that this is a long-term project in regards to landscape and visual matters, spanning generations.	The matters identified in the summary largely reiterate comments addressed individually above, including landscape mitigation and references to 'no mitigation'; landscape character, openness, agricultural land use and seasonality; professional judgement; operational replacement; future baseline and cumulative effects; visualisations; substations and other infrastructure; residential visual amenity; PRow and recreational routes; and long-term landscape management, monitoring and replacement planting. The Applicant refers to its preceding responses on these matters. For clarity, the Applicant does not consider that the LVIA understates the landscape or visual effects of

Reference	Topic	Matter Raised	Applicant's Response
17.40		Based on our review, it is clear from the LVIA findings that the Development is of a scale that would introduce extensive change to the existing agricultural landscape, permanently altering the character and experience of the Site and its immediate context. Significant adverse effects on both landscape character and visual receptors are identified at all stages of the Development, even following the establishment of mitigation (Year 15).	the Scheme. Significant adverse effects are identified where appropriate, including residual effects at Year 15. The landscape mitigation strategy seeks to balance targeted screening and landscape integration with retention of the characteristic openness and landscape pattern of the Fenland landscape. References to 'no mitigation' relate principally to the overhead line elements and should not be interpreted as a Scheme-wide approach to landscape and visual mitigation. In response to the specific comment regarding long-distance recreational routes, ES Figure 12-3 (Doc Ref. 6.2 Rev 1) has been updated at Deadline 2 to identify the relevant named routes, including the Macmillan Way, to improve clarity. Otherwise, the Applicant considers that the submitted LVIA and supporting appendices provide an appropriate and proportionate assessment of the likely landscape and visual effects of the Scheme, subject to the clarifications provided in the responses above.
17.41		The reliance on planted mitigation in a predominantly open landscape may introduce its own adverse effects, including changes to the perceived openness and rural qualities, and potential enclosure where currently absent. Consequently, the applicant has adopted a 'no mitigation approach' for some areas of the project. AAH would suggest that more mitigation can be integrated into this landscape where it relates to settlements, rivers, watercourses, existing scattered woodland blocks and existing field boundary vegetation.	
17.42	Methodology and assessment	Provide clearer explanation where professional judgement results in significance conclusions that differ from the indicative sensitivity and magnitude framework.	

Reference	Topic	Matter Raised	Applicant's Response
17.43		Clarify how replacement of panels, batteries and other infrastructure during the 40 year operational life has been considered within the assessment.	
17.44	Landscape baseline and assessment	Clarify the extent of vegetation removal, retention and reinstatement, secure these measures through the LEMP and DCO Requirements, and expand the assessment to include openness, seasonality and agricultural land use as landscape receptors.	
17.45		Review the future baseline to better reflect the scale of renewable energy development anticipated across the wider landscape.	
17.46	Visual assessment	Complete the visual assessment by providing Type 3 photomontages/Accurate Visual Representations (AVRs), including the solar arrays, substations, BESS compounds and overhead line infrastructure.	
17.47		Review the assessment of substations and other major infrastructure, provide further justification where effects remain unchanged throughout the project life, and explain the conclusion that a Residential Visual Amenity Assessment is not required.	
17.48		Strengthen the assessment of Public Rights of Way, National Cycle Routes, bridleways and other recreational routes, including additional viewpoints	

Reference	Topic	Matter Raised	Applicant's Response
		where appropriate, particularly along South Holland Main Drain.	
17.49	Design and mitigation	Review the layout and setbacks at South Holland Main Drain/Langary Gate Road (Field D) and Martins Road (Fields A and B), and consider targeted mitigation where compatible with landscape character.	
17.50		Strengthen the Outline LEMP through long-term management, monitoring and replacement planting commitments.	
17.51	Cumulative assessment	Keep the future baseline and cumulative assessment under review throughout the Examination to reflect emerging renewable energy and grid infrastructure proposals.	
17.52	Figures and supporting information	Provide clearer explanation of key assessment judgements within the main LVIA, reducing reliance on supporting appendices.	
17.53		Update Figure 12-3 to identify long-distance recreational routes and improve cumulative mapping by naming schemes rather than application numbers.	
17.54	Summary	Overall, the LVIA presented is robust with good methodology, clear explanations of assessment values and reasonable conclusions. The LVIA is	

Reference	Topic	Matter Raised	Applicant's Response
		transparent about the significant effects of the development on Landscape character and the visual setting, specifically along the Grid Connection Route, and acknowledges the limitations of mitigation to reduce these effects due to the nature of the existing open landscape. The project has generally been designed with sensitivity to reduce effects on receptors with setbacks and mitigation planting used sparingly to remain in keeping with the existing landscape.	
17.55		However, there are a few locations and receptors that are of concern and although it is acknowledged the landscape is open and generally sparsely vegetated, LCC / SHDC are concerned that this shouldn't mean a minimal approach to mitigation in all cases. Specifically, there may be scope to use localised vegetation for mitigation if it is targeted at sensitive views (e.g. VP3) or used where dwellings already have established vegetation (e.g. at Whaplode Drove). The importance of some PROW including those on South Holland Main Drain seems to have been overlooked. We would suggest that Figure 12-3 Public Rights of Way and National Cycle Route is keyed to highlight longer distance routes like the MacMillian Way. The solar array design (Field D) at	

Reference	Topic	Matter Raised	Applicant's Response
		the junction of South Holland Drain and Langary Gate Road does not have set backs, so the solar arrays will be on both sides of the PROW in this location.	
17.56		With regards to landscape character, the impact of the Solar arrays seems to be understated by the assessment with impact of the development on 'openness' and 'agricultural land use' not considered with sufficient emphasis. The assessment focuses on Landscape Character Areas which is appropriate, but landscape receptors can include 'constituent elements of the landscape' and 'specific perceptual qualities' P36 – GVLA3.	
17.57		With regards to visual amenity, the visual assessment seems to be understating the impact of the substations (possibly because their design is not finalised) and more explanation of their visual impact will be required as their design development progresses. There are also many dwellings in proximity to the development that will require localised mitigation to reduce visual impacts upon them. AAH look forward to reviewing planting designs, visualisations and more detailed proposals when this information becomes available.	

3.18. Appendix ii: Meridian Solar Farm. Soils, Agriculture and Land Use Impact. Report of Reading Agricultural Consultants (RAC) August 2026

Table 3-18: RAC Soils, Agriculture and Land Use Comments

Reference	Topic	Matter Raised	Applicant's Response
18.1	Soils	Section 5.6 of the ES describes the baseline conditions of the soils of the site; the survey that informs the assessment fails to describe typical cropping on the land surveyed or assess the economic output from the land.	Appendix A of this document provides cropping information for the Solar Development Area. However, an employment based rather than economic output based assessment is considered standard practice socio-economic assessments within EIAs, as explained within Table 3-9 and in response to comments 18.27 – 18.29 in this table.

Reference	Topic	Matter Raised	Applicant's Response
18.2		The soils of the area were mapped by the Soil Survey of England and Wales (SSEW) (the 1:250,000 scale National Map) as: the Wallasea 2 association in Parcels A, B and C, being deep, stoneless clayey soils derived from marine alluvium, calcareous in places and some deep calcareous silty soils; and the Wisbech association in Parcel D, being stoneless calcareous coarse silty soils, also derived from marine alluvium. It is notable that SSEW identifies soils in both associations as locally "calcareous in the Wallasea and calcareous in the Wisbech". More detailed mapping is readily available at 1:50,000 scale and is accompanied by the definitive reference text 'Soils of the Boston and Spalding District' (Soil Survey Memoir No. 27) published by the SSLRC in 1990. These detailed and authoritative references are not identified in the ES and there is no evidence that they were consulted in advance of the soil survey that informs the assessment of ALC grades at the site.	British Society of Soil Science guidance proposes referencing of published soil maps. The national scale soil maps and 1:50,000 Bedrock and Superficial geology mapping were consulted. The Wallasea and Wishbech soils are noted as "calcareous in places" not uniformly calcareous. This finding has been confirmed by the reported field survey, presented within ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] an earlier reconnaissance survey by Land Research Associated (LRA) and a 1991 ALC survey. All found the majority of soils on site to be non calcareous.
18.3		The ES places the Wallasea soils in Wetness Classes III and IV, citing the Bulletin accompanying the National Map. This is a misinterpretation, as the Bulletin puts these soils after drainage in Wetness Class II. Given the range of cropping on these soils (cereals, oil seed rape, potatoes, sugar beet and	Wallasea Soils are usually wetness class III to IV when undrained. Whilst there is drainage infrastructure in the area of the Site, the evidence of wetness within the clay soils shows seasonal waterlogging. The reconnaissance survey by LRA similarly identified that soil permeability has been subject to deterioration

Reference	Topic	Matter Raised	Applicant's Response
		brassicas) and the dense network on distributor drains maintained by the Internal Drainage Board, it is extremely unlikely that the land in the Meridian Scheme is undrained.	under prolonged arable and horticultural use, which is difficult to correct and so they have become slowly permeable and imperfectly-draining.
18.4		Non-calcareous Wallasea clay soils cannot be poorer than Subgrade 3a in this local climate, while calcareous Wallasea soils would be in Grade 2. The schedule of observations from the soil survey carried out to inform the grading of the site within the ALC framework fails to identify specifically calcareous soils and so a significant area of calcareous clayey alluvial soils, which cannot be poorer than Grade 2 in the ALC system, are classified as Grade 3b in the assessment. This appears to have been the consequence of a failure to undertake any field tests for calcareous soils and incorrectly assessing the Wetness Class; which failures should nullify the findings of the survey. Wisbech soils can be either Grade 1 or 2. If the ALC guidance is applied correctly, the whole area is of BMV quality.	The ALC survey reports (ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030]) have been updated at Deadline 1 to clarify where the calcareous testing undertaken on Site with 10% HCL yielded negative findings. The three most recent field surveys (i.e. the surveys reported within ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030], LRA 's reconnaissance survey and 1991 MAFF survey) within the study area found mostly non-calcareous soils The combination of Wetness Class III, clay topsoil and Field Capacity Days <126 results in ALC grade 3b, derived from table 6 of MAFF guidance¹⁷.

¹⁷ Ministry of Agriculture, Fisheries and Food (MAFF) (1988). Agricultural Land Classification of England and Wales: Revised Guidelines and Criteria for Grading the Quality of Agricultural Land (October 1988). Available at: [Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land - JP069](#). [Accessed 25/09/2026].

Reference	Topic	Matter Raised	Applicant's Response
18.5		The assessment also describes limitations to ALC grades, as presented in Appendices 5-2 and 5-3 to the ES. The most significant of these is the identification during the survey of a Slowly Permeable Layer (SPL) at between 30cm and 40cm depth across large parts of the site. This feature is claimed to limit the ALC grade to Subgrade 3b. These observations, made from hand augered samples, are only informed by observations made from the excavation of two soil pits, the locations of which are shown to be remote from a large proportion of the auger observations.	There is no minimum prescribed number of soil pits specified within statutory guidance for ALC surveys with the majority of planning applications following a minimum of one pit per soil type. ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] were also updated for Deadline 1, to include additional soil pit logs photographs across the Site.
18.6		Expert interpretation of these observations in the local context strongly suggests that the application of this limitation is wrong. NE guidance on ALC states that: <i>"soils developed in marine alluvium can have very porous subsoils due to the presence of vertical channels and such soils often do not have slowly permeable horizons"</i> This guidance is supported by the depth of the features observed in the photographs, which strongly suggests that they are the result of husbandry (plough pans) and are thus temporary and easily removed through the use of appropriate soil management practices [paras 16 & 42 et seq: RR].	For features of the soil profile to be considered temporary this would be typically within the top 35cm of the soil profile, as this is what is considered removable under normal agricultural practices. As the slowly permeable soil features extend deeper than this depth, it would not be practicable to remediate these soil profiles and thus are considered a permanent feature.

Reference	Topic	Matter Raised	Applicant's Response
18.7		Furthermore, the information derived from the two soil pits is limited to poor quality images and basic descriptions, which make interpretation difficult. British Society of Soil Science (BSSS) Guidance on assessing land classification requires that soils should be described using methods described in the Soil Survey Field Handbook, including the description of soil pits dug to at least 100 cm. The available evidence strongly suggests that this guidance has not been followed, and pits were dug to insufficient depth [Photographs 6 & 7 EN010169-000156-6.3 ES Appendix 5-2 Agricultural Land Classification Report - Parcels A and D and Photograph 9 EN010169-000157 6.3 ES Appendix 5-3 Agricultural Land Classification Report - Parcels B and C]. Further, there is no evidence of any detailed examination of soil structure in or colour of the pit walls. The assertion in the assessment of the presence of less than 0.50% biopores greater than 0.50mm diameter and of prismatic structures is made without the benefit of robust supporting evidence from observation pits. No laboratory evidence is available to support the texturing of the visible elements of the soil profile of any pit. This is not accepted practice [para 44: RR].	ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] were updated for Deadline 1 to clarify constraints, noting that due to ground conditions at the time of the survey, pits to a full depth were not possible. However, the pit depths which were excavated expose a sufficient portion of the subsoil for which observations could be made. ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] were also updated for Deadline 1 to include additional soil pit logs photographs across the Site. ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] include laboratory results of textural analysis at Appendix VI. Survey logs reflect the laboratory findings.

Reference	Topic	Matter Raised	Applicant's Response
18.8		In the Site Survey Logs [Appendix II of EN010169-000157-6.3 ES Appendix 5-3 Agricultural Land Classification Report - Parcels B and C & EN010169-000156-6.3 ES Appendix 5-2 Agricultural Land Classification Report - Parcels A and D], the recorded observations within each soil type described are generally similar in terms of horizon depths and content. The auger logs appear to have been copied and pasted and not individually described. This is despite the ES stating that "a degree of variability in physical characteristics within a discrete area is to be expected". The lack of variation in observations and lack of consistency between observed and measured laboratory soil textures fail to provide confidence in the ALC grading ascribed to each bore, particularly the clay soils graded as 3b, which rely on the identification of a slowly permeable horizon.	Soil logs have been written with a standardised terminology. Similarities in colours, textures and structures is expected in adjacent auger samples and will appear the same within the logs.
18.9		The ES contains no detailed description or images of the soil types identified at the site, and the lack of a baseline description of soils condition makes it impossible to establish a robust baseline from which changes in the physical and chemical characteristics of the soils of the Scheme area, pre- and post-development can be identified. This fails to comply	The Applicant notes that ISEP guidance requires that, for each of the main soil types, certain soil characteristics are to be recorded at a soil pit, including with photographs. The guidance references a pit for each main soil type and the guidance is met with the records provided within ES Appendix 5-3 Agricultural Land Classification Report - Parcels B and C [REP1-030] and ES Appendix 5-2 Agricultural

Reference	Topic	Matter Raised	Applicant's Response
		with recent ISEP guidance, which is referred to in the ES [pp3&4: RR].	Land Classification Report - Parcels A and D [REP1-028].
18.10		Taken with the failure to record the presence or absence of calcium carbonate in the surveyed soils, and the incorrect assignment of Wetness Class, in a situation where the downgrading of mapped BMV land is critical to the weight given to soils and agriculture in the planning balance, the available evidence is insufficient to support the conclusion drawn in the ES that the majority of the area taken by the Scheme is not BMV and that the loss of more than 418ha of highly productive BMV land for 40 years is not significant.	In the original application documentation negative results for calcium carbonate testing were not presented but that did not reflect an absence of testing. The presence of calcium carbonate in the upper soil layer improves Wetness Class. The uplift was not applied to Wetness Class following negative findings for calcium carbonate and findings for Wetness Class reflect the field survey. This was shared in a consultation exercise with LCC/RAC and Natural England. Appendix II of ES Appendix 5-3 Agricultural Land Classification Report - Parcels B and C [REP1-030] and ES Appendix 5-2 Agricultural Land Classification Report - Parcels A and D [REP1-028] were revised for Deadline 1 to identify negative results, providing the requested evidence. Reference is made to the loss of BMV land for 40 years. ES Chapter 5: Agriculture and Soils [REP1-014] differentiates between permanent effects resulting in the loss of BMV land and reversible effects where the land is not lost. Effects, treated as if permanent, where hardstanding would be required adopts 15 ha of BMV land and the effect is identified as a major adverse (significant) effect. Additionally, 140 ha of Grades 1 and 2 land would be adopted for

Reference	Topic	Matter Raised	Applicant's Response
			solar PV panels and this reversible land use has been presented as a moderate adverse (significant) effect. Other land use changes on BMV and non-BMV land are identified as not significant. These include the permanent planting of trees and shrubs at field boundaries.
18.11	OSMP	The baseline soils data used in the oSMP are based on the results of Meridian's ALC survey. The results of the survey are questioned in this report with particular regard to the identification of soil features within areas classified as Grade 3b, where established mapping strongly suggests that soils are likely to be sensitive to disturbance. Detailed surveys of soil type, structure and health should be carried out and a baseline, against which restoration and aftercare can be assessed, established before work on site commences, in order to inform accurately the final Soil Management Plan.	There is a relationship between ALC grade and the sensitivity of soils to disturbance but typically BMV land has higher resilience to disturbance. This is because soil texture is a determining feature of soil resilience. The data for soil texture obtained in the field were confirmed by laboratory analysis and provide appropriate data for soil management. The OSMP [REP1-068] recognises that soil handling will be governed by soil type rather than ALC grade. There is no standard measure of soil health. Visual assessment of soil structure can provide a useful contribution to soil differentiation. The OSMP [REP1-068] establishes roles for individuals responsible for the protection of soils on site.
18.12		The oSMP states that land restoration after decommissioning will aim to restore all agricultural land without diminution of original ALC grades, as informed by the detailed ALC survey. Given the lack of confidence in the findings of the original survey	The field survey presented within ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] followed the standard methods for undertaking ALC surveys. The Applicant is satisfied that the survey identifies the baseline condition for restoration.

Reference	Topic	Matter Raised	Applicant's Response
		which maps land, identified elsewhere as BMV, as non-BMV, it is not possible to write or rely on its recommendations without additional detailed survey work.	
18.13		The oSMP does not include any details of the nature or duration of any aftercare that may be necessary to restore disturbed land to its original ALC grade and condition. Aftercare should be described for all land stripped during the construction period, including access tracks, works compounds and electrical installations.	The OSMP [REP1-068] presents conditions for the stripping and storage of soil and managed through the operational phase. The decommissioning phase provides approaches to restoration, including of access tracks, compounds and electrical installations. Techniques to reduce compaction of subsoil and improve biological activity will be undertaken before loose tipping topsoil. The land will be returned to the landowner for land management post-construction. Rather than specifying an aftercare period, the OSMP [REP1-068] identifies the availability to the landowner/land operator of specialist advice from an agronomist, soil scientist or agricultural engineer until restoration is established to baseline conditions.
18.14		The oSMP also fails to consider the mass balance of soil types stripped from areas of temporary land take and appropriate storage in the consideration of soil movement and storage from construction, through operation to decommissioning and restoration. This is of particular concern with respect to the	Soil budgets and soil storage locations are to be developed within the detailed Soil Management Plan in conjunction or by the appointed contractor, and in accordance with the principles set out within the OSMP [REP1-068].

Reference	Topic	Matter Raised	Applicant's Response
		undertaking of necessary works during the establishment of inter array and grid connections, although equally applicable to works associated with the arrays.	
18.15		The oSMP fails to include description of soil storage, specifically: bund specifications for individual soil types and longevity, including maximum dimensions and vegetation management.	Soil budgets and soil storage locations are be developed within the detailed Soil Management Plan in conjunction or by the appointed contractor, and in accordance with the principles set out within the OSMP [REP1-068]. Statements on maximum heights of bunds and slope angles are included in the OSMP [REP1-068]. The inclusion of information on seeding a herbaceous sward and maintaining bunds free of woody species has been included in the OSMP [REP1-068] submitted at Deadline 1.
18.16		The Outline Construction Environmental Management Plan (oCEMP) identifies a risk associated with Unexploded Ordnance (UxO) in part of the Scheme area. This risk and details of mitigation methods should also be referenced in the oSMP, particularly with regard to completing the ALC surveys in plots of land shown as unsurveyed.	The OSMP [REP1-068] identifies that unsurveyed areas would be surveyed before construction. The necessary safeguards would be established in areas with the potential for unexploded ordinance (UXO). The additional survey information will be established to inform a detailed Soil Management Plan. There are no unforeseen environmental effects to agricultural land because of the unsurveyed parcels.

Reference	Topic	Matter Raised	Applicant's Response
18.17	Cumulative Land Take	DESNZ's Renewable Energy Planning Database monitors renewable energy projects quarterly. The database for Quarter One (Q1) of 2026 reflected Lincolnshire's rapid growth in energy infrastructure, with the area of planning permissions granted growing from 5,888ha to 7,036ha – a 1,148ha over two quarters. This represents a 19.5% increase in land take, compared with a 13% increase in land take nationally. Lincolnshire accounted for roughly 29% of all new nationally granted solar area over the two quarters despite only having approximately 5% of UK agricultural land. This strongly suggests that the County is having approved a disproportionate number of decisions for ground-mounted PV. The proposed solar development area grid and associated inter-array connection corridors occupy a total of 1,593.6ha, that is about 0.3% of Lincolnshire's farmland. Whilst this may seem like a small proportion of the farmed area of the County, it is important to view this proposal in the context of its contribution to the cumulative impact of all developments, and particularly solar developments on potentially sensitive receptors, as required in ES.	Cumulative assessment within ES Chapter 5: Agriculture and Soils [REP1-014] identifies not only planning permission granted but schemes in development, which are within the public domain. The cumulative assessment considered above ground infrastructure over a potential 11,238 ha. Within this total, the permanent loss of BMV land was 65 ha and the permanent loss of non-BMV land was 58 ha. On the basis of the total cumulative land-take calculated, it is estimated that cumulative solar schemes in Lincolnshire will account for approximately 3% of all agricultural land within Lincolnshire, with above ground infrastructure accounting for approximately 2.3 % of all agricultural land. An estimated 1.1 % of BMV land would be temporarily used and 0.02 % of BMV land permanently used across the identified solar projects. 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.

Reference	Topic	Matter Raised	Applicant's Response
18.18	Land Use and Cropping	The current and historical use of the land to be occupied by the Scheme is not described in greater detail than that it is "currently used to grow arable crops". Thus, the ES cannot assess the economic contribution of crops grown in the Scheme area to individual farm businesses affected, or the impact of the loss of production on the local or regional economies.	The physical effects of land use change are addressed in ES Chapter 5: Agriculture and Soils [REP1-014]. The socio-economic effects on the agricultural workforce are addressed in ES Chapter 14: Socio-Economics and Land Use [APP-065]. Appendix A of this document provides cropping data for the Solar Development Area.
18.19		ES requires that impacts of proposed developments are assessed cumulatively as well as in their own right. The lack of data on land use and cropping also renders it impossible to undertake any valid assessment of the cumulative impact of the proposal.	Cumulative effects on agricultural land are assessed in ES Chapter 5: Agriculture and Soils [REP1-014], which considered above ground infrastructure across a potential 11,238 ha, within which the permanent loss of BMV land was 65 ha and of non-BMV land was 58 ha. The assessment indicates that the solar schemes represent a small proportion of agricultural and BMV land in the County. Cumulative effects on employment and GVA are assessed in ES Chapter 14: Socio-Economics and Land Use [APP-065] and are not significant. Adding together gross output figures across schemes would not give a reliable or proportionate measure of cumulative economic effect, for reasons explained in response to 18.27 to 18.29 below.
18.20		The ES sets out detailed cumulative impact assessments for Agriculture and Soils, Materials and Waste, Traffic, and Landscape and Visual topics, addressing: • Nationally Significant Infrastructure Projects (NSIPs) within 30km, within five years; • Town and Country Planning Act (TCPA) applications within 15km with three years; and • Solar schemes within the administrative County of Lincolnshire within the past five years for NSIPs and three for TCPA applications. Only projects under the last bullet are considered in the agricultural land	

Reference	Topic	Matter Raised	Applicant's Response
		assessment. Projects assumed to form part of the existing baseline, that is operational schemes or schemes where construction is nearly complete, are excluded from the assessment, along with schemes that have had permission refused, have been withdrawn, or otherwise have not proceeded.	
18.21		The ES fails to assess any cumulative effects relating the use of land and its productivity, specifically in terms of its contribution to the local and regional economies.	
18.22		The Scheme is said to be temporary, and the ES fails to include any assessment of any changes that are likely to be experienced during the life of the development. For instance, no evidence provided of change in the health of land taken out of production and subject to reduced solar inputs for an extended period, and there is no proposal for the establishment of any baseline condition of soil health in order that change can be assessed at the end of the Scheme's life.	There are no agreed or readily achievable measures of soil health because of spatial and temporal variation. A programme of monitoring of soil health is not considered proportionate on the basis of the likely significance of any potential effects. The principle of removing soil cultivation and establishing permanent vegetation cover being beneficial to soil are established (for example, British Society of Soil Science ¹⁸). This improves soil structure and carbon sequestration. These are noted in ES Chapter 5: Agriculture and Soils [REP1-014].

¹⁸ British Society of Soil Science (2022) Science Note: Soil Carbon. Available at: https://soils.org.uk/wp-content/uploads/2022/05/BSSS_Science-Note_Soil-Carbon_Final_May22_75YRS_DIGITAL.pdf [Accessed 01/10/2026]

Reference	Topic	Matter Raised	Applicant's Response
18.23		Whilst it is accepted that short term fallowing of intensively farmed arable land has a generally positive effect on soil health, there is little research into the long-term removal of highly productive land from agriculture. A review of Rothamsted Research's Highfield experiment suggests that 50 years of management of typical silty clay loam soil as bare-fallow can result in significant reductions in soil carbon and nitrogen, and in the abundance of biological communities, with soil structure also severely compromised.	The Scheme will not operate areas of bare fallow and so the comparison with the Rothamsted experiment is not germane to the proposed Scheme. A herb-rich sward is to be created within the Solar Development Area and hence the comparison is made against annual cultivations. These positive effects of this on soil resources is noted in ES Chapter 5: Agriculture and Soils [REP1-014]. Indeed, it would be possible to apply ISEP guidelines to present these changes as a moderate beneficial effect (significant) but professional judgement has been applied to moderate the impact, such that it is presented as a minor benefit (not significant).
18.24		Uncertainty regarding the impacts of permanent shade and differential wetting on plant communities and soil structure and health under solar arrays means that it is impossible to definitively foretell the true impact of long-term change of use on high-quality soils. Thus, in the absence of evidence of long-term PV being beneficial to these soils, it is reasonable to retain them for agricultural production.	There are no agreed or readily achievable measures of soil health because of spatial and temporal variation. A programme of monitoring of soil health is not considered proportionate on the basis of the likely significance of any potential effects. Differential wetting on a diverse sward will create differential niches for biodiversity but a research investigation is not proposed.
18.25		Furthermore, land that currently benefits from irrigation is not identified. Irrigation enables the full versatility of land to be utilised, including the production of high value crops such as potatoes,	Appendix A of this document provides cropping data and indicates, where irrigation may be actively used. Water Supply Strategy (Doc Ref. 8.37) submitted for Deadline 2 also notes that license trading can be used

Reference	Topic	Matter Raised	Applicant's Response
		sugar beet and brassicas. Any extended interruption to the use of an irrigation abstraction licence is extremely likely to result in the revocation of that licence by the Environment Agency. Any such revocation will be permanent, and it is unlikely that a licence similar to the original would be granted when the land is returned to agriculture, so limiting the use of the land to crops not requiring irrigation. Thus, any land benefitting from irrigation will be less productive on decommissioning of the solar array than is currently the case. The ES fails to identify any agricultural land that benefits from irrigation and thus cannot accurately assess the temporary or likely permanent impacts of its loss from the farming economy.	for any existing abstraction licenses currently used on the Site to use water for the Scheme, where spare capacity exists. Active water abstraction license locations within 1km of the Order Limits are mapped on ES Figure 11-1 [APP-106].
18.26		Drainage and other existing underground infrastructure, such irrigation mains, are critical elements of effective agricultural land management in the Fens. Most such infrastructure is buried with about 0.75m of cover, just below the maximum depth of normal tillage operations. The ES does not take into account the possible disruption of this infrastructure during the installation and decommissioning of the solar arrays, including the inter array connections.	Measures to protect existing drainage are secured through the OCEMP [REP1-061]. • Protection of existing field drainage • The Principal Contractor shall ensure that existing field drainage systems are not compromised as a result of construction. Field drainage systems will be maintained during construction and reinstated so far as reasonably practicable to a condition that is as

Reference	Topic	Matter Raised	Applicant's Response
			effective as the previous condition on completion. • The Principal Contractor will coordinate drainage surveys to establish the existing drainage position including any related field drainage that may be affected by the Scheme and these will be marked where encountered. The Principal Contractor shall record the location, condition and characteristics (e.g. depth of installation, pipe type and diameter) of drains cut or disturbed by construction of the Scheme. • Any field drainage affected by the Scheme shall be either reinstated or diverted to secondary channels if reasonably practicable. Landowners and occupiers shall be informed, through the Environment Manager of the design and timing of drainage works required during construction and following completion of the works, including, where relevant, in relation to pipe layout, falls, dimensions and outfalls.
18.27		In the absence of cropping details for the Scheme area, an estimate of typical cropping for the	The Applicant's assessment of effects on agricultural land holdings in ES Chapter 14: Socio-Economics and

Reference	Topic	Matter Raised	Applicant's Response
		immediate area has been made using cropping data from the Rural Payment Agency's Crop Map of England (CROME) for the years 2021-2025. Crome shows that the cropping of the area is mixed, including cereals (55.7%); cover crops (12%); peas and beans (7.6%); oilseeds (6.3%); maize (5.8%); sugar beet (4.1%); potatoes (2.5%); and others, including onions and brassicas (6%).	Land Use [APP-065] is receptor-based. It considers the landowners and tenants affected, the sensitivity of their holdings, and the potential for the Scheme to compromise the viability of the holding. Economic impacts are assessed in terms of employment, through consideration of the jobs supported by on-site uses and the application of multipliers to account for the indirect and induced employment within the supply chain. This is a more robust approach to assessing effects on agricultural landholdings and the economy than one which depends on the type and value of individual crops currently produced on the land. This approach has been used for numerous other DCO applications and is considered proportionate. The baseline records that the Site is predominantly agricultural land, mainly arable with some grazing, and that the Solar Development Area is farmed by five landowners with no tenant farmers. The Applicant considers this sufficient to reach a reasoned conclusion on likely significant effects relating to agricultural landholdings and employment. RAC's estimate of £1,431,000 to £1,904,000 per annum gross agricultural output indicates the revenue which could be raised by the crops if they were sold. It is not accurate to state that this is the
18.28		The potential agricultural output achievable from this range and area of cropping across the 1064.1ha of the proposed development area (excluding impacts associated with grid and array connectors) is estimated to be between £1,431,000 and £1,904,000 annually, based on standard costs taken from the 2026 edition of the John Nix Pocketbook for Farm Management; that is an average annual output per hectare of between £1,345 and £1,789. Whilst the expected life of many solar farms is being promoted to be 60 years, for the claimed 40 years of this development that would be between £57,20,000 and £76,160,000 lost to the local economy, excluding any added value within the supply chain. In order to put this into context with the rest of the County, a similar exercise has been carried out to estimate the proportions of crops grown in the	

Reference	Topic	Matter Raised	Applicant's Response
		administrative County of Lincolnshire and apply standard values for outputs. 74. Field scale agriculture in Lincolnshire covers about 435,700ha and the cropping data from CROME for the years 2021-2025 shows a similar mixture of cropping, including cereals (44.7%); cover crops & fallow (18%); peas and beans (5.2%); oilseeds (5.5%); maize (6.6%); sugar beet (3.4%); potatoes (1.9%); others, including onions and brassicas (0.8%), grassland and forage (13.8%); and cover crops, fallow, hedgerow. 75. The potential agricultural output achievable from this range and area of cropping is estimated to be between £477,663,500 and £635,735,000 annually, based on standard costs taken from the 2026 edition of the John Nix Pocketbook for Farm Management; that is an average annual output per hectare of between £1,096 and £1,459 across the County. These values exclude any value added within the supply chain.	value which would go into the local economy. Gross output does not reflect the costs of production (including fuel, fertiliser, seed and machinery), and a substantial proportion of spending on these items would go outside the local area. While some of the crops may be sold and consumed locally, it is likely that much the produce will be transported outside of Lincolnshire to retailers and wholesalers based elsewhere in the country. The sum of £57.24 million to £76.16 million is similarly not a robust representation of the net economic effect on the local economy. ES Chapter 14: Socio-Economics and Land Use [APP-065] considers economic effects in terms of employment on a net basis, adopting a robust and proportionate approach. Notwithstanding the above, the Applicant has provided crop information for the Solar Development Area within Appendix A of this document. That information demonstrates that in 2025 a quarter of the land was diverted to environmental schemes and not producing any crops, and that cropping was otherwise dominated by cereals rather than higher value vegetables. Available information indicates that the end market for cereals was animal fodder and energy use, and that the crops supplied for human consumption were limited.
18.29		Thus, the economic output per hectare attributable to agriculture on the proposed development area is about 23% greater than that averaged across the County. This significant difference in productivity has not been taken into account in the ES.	

Reference	Topic	Matter Raised	Applicant's Response
			The RAC approach also does not take account of the c. 160 ha of land within the Solar Development Area that will be retained in arable use, or of the diversified rental income that landowners will receive from hosting the Scheme, which offsets the change in farming income. All landowners within the Solar Development Area have entered into voluntary agreements with the Applicant, and there are no tenant farmers within these areas. On employment, the ES concludes that any loss of agricultural sector employment is likely to be minimal, given that the Solar Development Area is farmed by the landowners themselves and that any contractors involved are not wholly reliant on the land. The Scheme is estimated to generate a net gain of 11 FTE jobs during operation. On this basis, the ES concludes that the effect on agricultural land holdings within the Solar Development Area is minor beneficial (not significant), and that the effect on the local economy from employment is negligible (not significant).
18.30		It is also clear from this summary that the area of land under, allocated and being considered for ground-mounted solar PV in Lincolnshire, including this proposal, is approaching that proportion of land	The Applicant has provided further explanation for the siting of the Scheme on BMV agricultural land in response to issues raised in the earlier tables. The

Reference	Topic	Matter Raised	Applicant's Response
		suggested in the LUF as necessary for solar and wind energy across England. It has been acknowledged by the Secretary of State for Energy Security and Net Zero in their Outer Dowsing Decision Letter that there is no defined threshold upon which a conclusion regarding the acceptability of the loss of BMV land can be made if the cumulative loss of agricultural land is proceeding without consideration of when the tipping point into unacceptability is reached.	impacts of this are assessed within ES Chapter 5: Agricultural Land and Soils [REP1-014].
18.31		It is proposed that this tipping point is being approached, where the County of Lincolnshire, which contributes more agricultural output than any other county, is already at or nearing the committed proportion of solar development identified as the average national requirement. In the case of this Scheme the proportion of BMV land to be taken is reasonably disputed and the Applicant has failed to justify its loss from production for 40 years claimed by the Developer or for an extended period of 60 years, as is claimed by a number of concurrent Solar NSIPs, in Lincolnshire and across the UK.	
18.32		At such a critical time in the delivery of solar energy, it is imperative that proposals should be fully justified in terms of guidance set out by Authority. In this case, the Applicant has made no attempt to	

Reference	Topic	Matter Raised	Applicant's Response
		avoid BMV land and has failed to justify any exception to the Government's guidance on the use of BMV land for solar PV.	
18.33		The ES also suggests that grazing by sheep could maintain agricultural production. Sheep cannot graze on weeds arising from intensive arable production, so the land would have to be converted to grassland, preferable creeping fescue to avoid poaching. The grass would have to be sown before construction and would take two years to become established and resilient to traffic movements during construction and between the arrays. This complication is not considered as part of the assessment.	Habitat management will not allow arable weeds to dominate land within the Scheme. Land management responsibilities are secured through the OLEMP [REP1-070]. This includes converting areas of agricultural land around and beneath the solar PV panels into species rich grassland.
18.34	Socio-economic issues	Whilst the direct economic impacts of the Scheme are relatively easy to estimate, social impacts such as employment are less easy, given the lack of information about the farm businesses affected. Indirect impacts, on agricultural businesses such as machinery dealers, seed and fertiliser merchants, transport, packing and processing cannot realistically be estimated without detailed knowledge of the businesses.	As outlined within ES Chapter 14: Socio-Economics and Land Use [APP-065], the likely impacts on agricultural employment have been considered within the assessment of net employment effects during operation. Indirect impacts on businesses in the supply chain are covered through the application of multipliers. The Solar Development Area is farmed by the landowners and there are no tenant farmers, so there is no displacement of tenants. The landowners will continue to generate income from their land during construction and operation of the Scheme. There may be some contractors who undertake farming activities on the land, but it is very likely that

Reference	Topic	Matter Raised	Applicant's Response
			such contractors would not be entirely reliant on these farms for employment. Any loss of agricultural employment is therefore likely to be minimal. Within the Grid Connection Route and Inter-Array Connections, disruption to farming activities would largely be temporary and short term. A more detailed assessment of indirect effects on the agricultural supply chain would require further research and / or consultation, which would not be proportionate. 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 the wider agricultural supply chain.
18.35		The Socioeconomics and Land Use Chapter (14) of the ES fails to take fully into account ISEP guidance on the essential components of Environmental Assessments and Reports [p4: RR].	The Applicant has reviewed the ISEP (2025) guidance on Solar PV on Agricultural Land, as recorded in ES Chapter 5: Agriculture and Soils [REP1-014]. The socio-economic matters it raises are addressed in ES Chapter 14: Socio-Economics and Land Use [APP-065]. The Solar Development Area is farmed by the landowners and there are no tenant farmers, so there is no displacement of tenants. The tenant farmers

Reference	Topic	Matter Raised	Applicant's Response
			along the Grid Connection Route and Inter-Array Connections are identified and assessed as receptors. Effects on agricultural employment and the wider economy are assessed on a net basis, taking account of leakage, displacement and multiplier effects, and cumulative effects are assessed in ES Chapter 5: Agriculture and Soils [REP1-014] and ES Chapter 14: Socio-Economics and Land Use [APP-065]. The Applicant considers the assessment to be proportionate and consistent with the guidance.
18.36	Agricultural businesses - Temporary	A total of 42 agricultural landowners are located within the grid connection route and three tenants who farm the agricultural land, and a further 14 agricultural landowners located within the inter-array connections and two tenants who farm the agricultural land. The holdings are identified as having medium sensitivity on the grounds that the area is rural, numerous holdings are affected and there is potential for substitution because of the number of holdings in the area. No details of the specific nature of cropping or the scale of the affected businesses or the infrastructure/ investment in holdings are described to permit specific assessment of impacts to be made.	ES Chapter 14: Socio-Economics and Land Use [APP-065] identifies the landowners and tenant farmers affected along the Grid Connection Route (42 landowners and three tenants) and the Inter-Array Connections (14 landowners and two tenants) and assesses the effect on their holdings. The holdings are assigned medium sensitivity, reflecting the number of holdings that could be affected and the potential for substitution given the abundance of farm holdings in the surrounding area. The magnitude of impact is assessed as low, because the works are temporary and limited in duration, the land will be reinstated, and landowner agreements are being pursued. Before construction, a detailed Soil Management Plan will be submitted in accordance with the OSMP [REP1-068], ensuring that soils are not degraded and that farming
18.37		The impact associated with construction on the holdings affected by the grid connection route and	

Reference	Topic	Matter Raised	Applicant's Response
		inter array connections is identified as being temporary and fully mitigated and so is assessed as low, given the temporary nature of the development the magnitude of impacts, although the nature and scale of any impacts are not described.	activities can recommence after construction. This leads to a minor adverse effect, which is not significant. The Applicant considers this sufficient to reach a reasoned conclusion on likely significant effects, and a more detailed baseline of cropping on each holding would not alter that conclusion, given the temporary nature and limited scale of the works.
18.38		Overall, the Scheme is assessed as having a low to very low adverse impact for both landowners and tenants with medium sensitivity affected by the grid connection route and inter array connections, leading to a negligible to minor adverse effect. This is considered not significant by the Developer.	
18.39	Agricultural businesses - Permanent	The ES states that voluntary agreements have been reached with all landowners in the Scheme area and that it provides an opportunity to diversify operations and generate non-agricultural income from their land. The affected agricultural land holdings have been assigned a medium sensitivity. The provision of an income from the land occupied by the proposed scheme is identified as a beneficial impact and its magnitude has been assessed as medium beneficial. 180ha of land within the Scheme area will be retained for agricultural use, for ecological mitigation.	ES Chapter 14: Socio-Economics and Land Use [APP-065] assesses the effect on the holdings in the Solar Development Areas by considering both the change in land use and the non-agricultural income the landowners will receive. The five landowners have entered into voluntary agreements with the Applicant, there are no tenant farmers, and the Scheme provides an opportunity to diversify their operations. The holdings are assigned medium sensitivity, and the assessment concludes that the change in land use would not compromise the financial viability of individual holdings. c. 160 ha of land within the Solar Development Areas will be retained in agricultural use.
18.40		Given that the proposed scheme will provide a diversified source of income for landowners, the	

Reference	Topic	Matter Raised	Applicant's Response
		assessment concludes that the proposed change in land use would not compromise the financial viability of individual farm holdings and so assesses the effect on agricultural land holdings as minor beneficial, that is not significant.	The Applicant considers this sufficient to reach a reasoned conclusion on likely significant effects, and a more detailed baseline of cropping and rotations would not alter the conclusion, which is based on continued viability of the holdings and the absence of a material loss of agricultural employment. On effects beyond the farm boundary, the ES concludes that any loss of agricultural employment is likely to be minimal, as the land is farmed by the landowners themselves and any contractors involved are not wholly reliant on it. It is therefore considered reasonable to conclude that the Scheme would not have a significant effect on the wider agricultural supply chain.
18.41		The ES fails to take into account the nature and extent of the affected holdings and the impacts each business will experience, including the cropping and rotational areas that will be lost. Further, the removal of 1,064.1ha of land of unknown outputs from production is likely to have impacts extending beyond the farm boundary.	
18.42	Employment	The ES fails to take any impact on employment caused by the withdrawal of the land from production or the knock on impacts any losses may have on local services such as shops, schools and tradesmen.	ES Chapter 14: Socio-Economics and Land Use [APP-065] considers the effect of the Scheme on agricultural employment. The Solar Development Areas are farmed by the landowners themselves with no loss of agricultural employment. The landowners will continue to generate income from their land through the Scheme, and the Scheme is estimated to generate a net gain of 11 FTE jobs during operation. As no material loss of agricultural employment or of landowner income is anticipated, the Applicant does

Reference	Topic	Matter Raised	Applicant's Response
			not expect the Scheme to have a knock-on effect on local services such as shops, schools and tradesmen.
18.43	Economic Impacts	The ES makes no effort to examine in detail the impact on these businesses and therefore cannot extend any assessment beyond the boundary of the proposal. This failure makes it impossible to enable the Secretary of State to take into account the economic and other benefits of that land, as required by the Overarching National Policy Statement for Energy (EN-1).	ES Chapter 14: Socio-Economics and Land Use [APP-065] assesses the economic effects of the Scheme on the affected agricultural holdings, including their income and viability, and on employment and GVA in the wider study area, taking account of leakage, displacement and multiplier effects. This is consistent with paragraphs 5.13.2 and 5.13.4 of EN-1, which require applicants to assess likely local and regional socio-economic impacts. Paragraph 5.11.34 of EN-1 directs the Secretary of State to take into account the economic and other benefits of Best and Most Versatile (BMV) land where a scheme is sited on it. The Applicant has provided the information for this purpose in ES Chapter 5: Agriculture and Soils [REP1-014] and ES Chapter 14: Socio-Economics and Land Use [APP-065], which together describe the quality of the land, the effects on the holdings and the effects on the local economy.
18.44	Assessment	In the case of this application, detailed survey carried out for the ES identified the distribution of land grades as: 120.6ha of Grade 1 (11.3%); 92.6ha of Grade 2 (8.7%); 205.4ha of Subgrade 3a (19.2%) and 523.7ha of Subgrade 3b (49.1%) land. 101. This grading is significantly different to other sources of	The Applicant would note that LCC's critique of the ALC survey is based on predictive mapping and historic data. Predictive ALC mapping assumes effective under-drainage of soils, which then allows the land to achieve BMV status. However, drainage

Reference	Topic	Matter Raised	Applicant's Response
		land grading: • • • NE's 2026 Predictive ALC map for England shows the whole area within ALC Grades 1, 2 and 3a; NE's strategic scale map of the East Midlands Region of England, predicting the likelihood of BMV land shows that there is a high likelihood, that is 60% or greater chance, of the land being BMV; and MAFF and the Soil Survey of England and Wales' 1:63,360 scale indicates that the land occupied by the Scheme is all within Grades 1 and 2, that is BMV land.	requires maintenance; the effectiveness of tile drains and mole drains should not be assumed. Survey evidence indicates that soil wetness was the limiting factor in some areas. For example, root channels into lower soil layers were not observed. The functioning of tile drains, whether perforated plastic or clay, diminishes over time. Tile drains are used in tandem with unlined mole drains that deteriorate through collapse and silting. Differences between modelled outputs, historical records and the survey would be expected if under-drainage was not delivering to its full potential. For this reason, predictive mapping and historic data is less reliable than recent field survey.
18.45		Thus, the conclusions drawn and used in the assessment are significantly different from any previously published assessment of the quality of the land of the proposed development area and of the surrounding area, a difference which is not commented on or justified in the ES.	The ALC survey results presented within ES Appendix 5-2 [REP1-028] and ES Appendix 5-3 [REP1-030] provide higher resolution survey information across the Solar Development Area, which is representative of existing, rather than the predictive model conditions. The Applicant would also note that large areas of Grade 3b land were

Reference	Topic	Matter Raised	Applicant's Response
			identified by LRA¹⁹ within the Solar Development Area as part of the reconnaissance survey in 2023-2024. As such, two separate surveys by separate surveyors have concluded Grade 3b ALC classification land within parts of the Site, particularly within Land Parcel D. Furthermore, Appendix A of this document provides cropping information for the Solar Development Area over the past years. This cropping data is not characteristic of Grade 1 and Grade 2 ALC land throughout the Site, as would be suggested by the predictive mapping, but is indicative of Grade 3a and Grade 3b land within parts of the Site. Published data was considered to aid understanding of the baseline, with sources used presented within ES Chapter 5: Agriculture and Soils [REP1-014]. They informed preparation for field surveys. The predictive model of ALC was not available at this stage, however, would not change the conclusions of the assessment. The field survey data were derived at a

¹⁹ 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]

Reference	Topic	Matter Raised	Applicant's Response
			higher spatial resolution than the cited materials and derived from direct examination of materials, providing higher value data than the published materials. ES Chapter 5: Agriculture and Soils [REP1-014] referenced the nationally recognised soil mapping datasets alongside published geological information from the BGS. The soils identified during the survey were consistent with the mapped Wallasea 2 Association and with the published superficial geological deposits. Reconnaissance survey undertaken by LRA similarly identified that soil permeability has been subject to deterioration under prolonged arable and horticultural use. This survey reported that the clay subsoils were firm and compacted, which is difficult to correct and so they have become slowly permeable and imperfectly drained. Hence, the survey conclusions do mirror other recent field data. The Applicant presented information from the reconnaissance survey in its Preliminary Environmental Impact Report but because it was at a variable sample intensity, a new survey was undertaken to inform the ES Chapter 5: Agriculture and Soils [REP1-014]. Hence, survey data presented is not inconsistent with other recent data.

Reference	Topic	Matter Raised	Applicant's Response
18.46		Section 5.8 of ES Chapter 5, Agriculture and Soils, assesses the potential impacts and likely significant effects of the Scheme. Footnote 14 to Table 5-12 and footnote 16 to Table 5-13 state that, because the restoration of Grades 1 and 2 land to be occupied with BESS stations and solar stations to its original condition cannot be guaranteed, the assessment assumes a permanent impact across this area. This differentiation is not reflected in the body of the table and the respective totals for permanent and temporary land take cannot be verified and the validity of the summary table of effects (Table 5-16) is uncertain.	ES Chapter 5: Agriculture and Soils [REP1-014] has been revised for Deadline 1 to reflect that areas of hardstanding, although to be restored, are assessed as a worst case scenario as if having a permanent effect. The approach has been extended to include Subgrade 3a land.
18.47		Furthermore, the separate treatment of Grades 1 and 2, and Grade 3 land, all BMV land, is not justified. It is the view of the Council that all BMV land should be treated equally and that impacts on Grade 3a land should be regarded as permanent. This change would cause the assessment of effects to be changed, with a significantly greater area of land would be classified as suffering a Moderate Adverse effect. Where land has been under-graded in the assessment, and land falls into Grade 1 and 2, the effect would be Significant Major Adverse.	ES Chapter 5: Agriculture and Soils [REP1-014] has been revised for Deadline 1 to reflect that areas of hardstanding, although to be restored, will be assessed as if having a permanent effect. The approach has been extended to include Subgrade 3a land. The change does not introduce a new significant effect but the revision for Deadline 1 now identifies the significant effect to be major adverse.

Reference	Topic	Matter Raised	Applicant's Response
18.48		The ES fails to identify a detailed cropping history for the Scheme area and potential agricultural output from it.	Appendix A of this document provides cropping data for the Solar Development Area. Cropping history indicates limited production of crops for the human food chain – some areas of potatoes, peas and sugar beet. Most of the land is used for the bioenergy sector or animal feed. Some areas are established with winter bird food crops under the Sustainable Farming Incentive.
18.49		An assessment of cropping in the immediate area of the Scheme shows that the cropping of the area is mixed, including cereals (55.7%); cover crops (12%); peas and beans (7.6%); oilseeds (6.3%); maize (5.8%); sugar beet (4.1%); potatoes (2.5%); and others, including onions and brassicas (6%). The potential agricultural output achievable from this range and area of cropping across the proposed Scheme area (excluding impacts associated with grid and array connectors) is estimated to be between £1,431,000 and £1,904,000 annually, that is an average annual output per hectare of between £1,345 and £1,789. Over the 40-year design life of the Scheme, this equates to a loss to the local economy of between £57,20,000 and £76,160,000, excluding any added value within the supply chain.	As noted above, the crops currently grown on the land and the associated economic output is not a valid assessment of impacts on the local economy. Much of the revenue raised from a crop will be spent on costs associated with production, or flow to retailers and wholesalers outside of Lincolnshire.

Reference	Topic	Matter Raised	Applicant's Response
		This should be compared with field scale agriculture in Lincolnshire as a whole, which has a cropping mix comprising: cereals (44.7%); cover crops & fallow (18%); peas and beans (5.2%); oilseeds (5.5%); maize (6.6%); sugar beet (3.4%); potatoes (1.9%); others, including onions and brassicas (0.8%), grassland and forage (13.8%); and cover crops, fallow, hedgerow. 10906_Meridian-LIR_Agric 20 August 2026 Page 417 Reading Agricultural Consultants The potential agricultural output achievable from this range and area of cropping is estimated to be between £477,663,500 and £635,735,000 annually, that is an average annual output per hectare of between £1,096 and £1,459 across the County. These values also exclude any value added within the supply chain.	
18.50		This analysis shows that the economic output per hectare attributable to agriculture on the proposed development area is about 23% greater than that averaged across the County. This significant difference in productivity and thus the role of the land in the local economy should be taken into account in the planning balance.	
18.51		In the case of this proposal, it is contended by LCC that development occupies solely BMV land and that	ES Chapter 5: Agriculture and Soils [REP1-014] establishes baseline conditions. The land was

Reference	Topic	Matter Raised	Applicant's Response
		no attempt has been made to mitigate the loss of highly productive BMV land in the County.	identified as a combination of BMV land and non-BMV land. The land will not be lost as the land use change is for the most part reversible. Measures have been taken to minimise effects on BMV land. Physical development and retention of arable land within Habitat Management Area 6 (for skylark benefit) was targeted to areas with mainly Grade 1 and Grade 2 land. Similarly, avoiding woodland blocks as part of the landscape design was in part to minimise negative impacts on BMV land.
18.52	Summary	The total area of Best and Most Versatile (BMV) agricultural land taken for the development varies according to the source used. The results of the survey carried out for the ES is inadequate to justify the conclusions drawn in the assessment, given its failure to properly grade land. LCC contends that the Scheme occupies solely BMV land and that no attempt has been made to mitigate the loss of highly productive BMV land in the County.	The Applicant has engaged subject specialists to provide a survey of baseline conditions reported in ES Chapter 5: Agriculture and Soils [REP1-014]. Measures have been taken to minimise effects on BMV land. Physical development and retention of arable land within Habitat Management Area 6 (for skylark benefit) was targeted to areas with mainly Grade 1 and Grade 2 land. Similarly, avoiding woodland blocks as part of the landscape design was in part to minimise negative impacts on BMV land.
18.53		The ES fails satisfy the requirement of the Overarching National Policy Statement for Energy (EN 1) that Applicants should seek to minimise impacts on BMV land and the Secretary of State should ensure that where schemes are to be sited on BMV land the economic and other benefits of that	The Planning Statement [APP-260] provides the planning balance for the Scheme, taking into account national policy. The Scheme is a Critical National Priority project due to the urgent for new low carbon energy infrastructure.

Reference	Topic	Matter Raised	Applicant's Response
		land should be taken into account and the development justified, which this application fails to do.	While BMV impacts are a consideration, as set out in 5.11.34 of EN-1, paragraph 2.10.21 of EN-3 states that while preference should be given to poor quality land "<i>land type should not be predominating factor in determining the stability of the site</i>". The Site Selection Report [APP-264] and Post ISH1 Note: Strategic Site Selection (Doc Ref. 8.35) detail how BMV land has been considered as part of the site selection process. The Applicant has set out the environmental, social and economic benefits and disbenefits within the Planning Statement, and concludes that, while there would be some residual impacts, these do not outweigh the urgent need for the delivery of the Scheme.
18.54		The ES fails to address any cumulative effects relating to the use of land and its productivity, specifically in terms of its contribution to the local and regional economies. LCC calculates that the annual productivity of the land is between £1,345/ha and £1,789/ha, for the solar PV areas, that is £1,431,000 and £1,904,000 annually or a loss to the local economy over the 40 year life of the development of between £57,200,000 and £76,160,000.	The figures cited are estimates of gross agricultural output. They do not represent the net economic effect of the Scheme on the local or regional economy, because they do not account for the costs of production, leakage outside the local area, retained agricultural land or the rental income received by landowners. Cumulative effects on agricultural land are assessed in ES Chapter 5: Agriculture and Soils [REP1-014], which considered above ground infrastructure across a potential 11,238 ha, within which the permanent loss of BMV land was 65 ha and of non-BMV land was 58 ha. This is indicative

Reference	Topic	Matter Raised	Applicant's Response
			that the solar schemes represent a small proportion of agricultural and BMV land in the County. Cumulative effects on employment and GVA are assessed in ES Chapter 14: Socio-Economics and Land Use [APP-065] and are not significant. Adding together gross output figures across schemes would repeat the limitations described above, in response to 18.27-18.29, and would not give a reliable or proportionate measure of cumulative economic effect.
18.55		The area of land under, allocated to and being considered for ground-mounted solar PV in Lincolnshire, including this proposal, accounts for 1.3% of the County's farmland, that is approaching the 1.8% proportion of utilised agricultural area land suggested in the LUF as necessary for solar and wind energy in the UK. There is no defined threshold upon which a conclusion regarding the acceptability of the loss of BMV land can be made if the cumulative loss of agricultural land is proceeding without consideration of when a tipping point into unacceptability is reached.	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.
18.56		It is proposed that this point is being approached, where the County of Lincolnshire, which contributes more agricultural output than any other county, is nearing the committed proportion of solar	The Applicant notes the importance of Lincolnshire as an agricultural county but contends that neither

Reference	Topic	Matter Raised	Applicant's Response
		development identified as the average national requirement.	the Scheme nor cumulative solar developments change the agricultural character of the county.
18.57		At such a critical time in the delivery of solar energy, it is imperative that proposals should be fully justified in terms of guidance set out by Authority. In this case, the Applicant has made no attempt to recognise the contribution of BMV land to productivity, and has failed to justify any exception to the Government's guidance on the use of BMV land for solar PV.	The Applicant has provided a response in the Site Selection and Alternatives table regarding the consideration of BMV land as part of site selection.
18.58		The ES fails to take into account the nature and extent of the affected holdings and the impacts each business will experience, including the cropping and rotational areas that will be lost.	The assessment in ES Chapter 14: Socio-Economics and Land Use [APP-065] is receptor-based. It identifies the landowners and tenants affected in each part of the Scheme, identifying that there are five landowners and no tenant farmers in the Solar Development Areas, 42 landowners and three tenants along the Grid Connection Route, and 14 landowners and two tenants along the Inter-Array Connections. It assesses the sensitivity of the agricultural land holdings and the potential for the Scheme to compromise their viability, using the criteria in the chapter. The baseline records that the Site is predominantly agricultural land, mainly arable with some grazing. The Applicant considers this sufficient to reach a reasoned conclusion on likely significant effects. A more detailed baseline of

Reference	Topic	Matter Raised	Applicant's Response
			cropping and rotations for each holding would not alter the conclusions of the assessment, because they rest on landowner income, the continued viability of the holdings and the absence of a material loss of agricultural employment.
18.59		Further, the removal of the land from production is likely to have impacts extending to businesses in the food chain and farming support sector beyond the farm boundary. The ES fails to take any impact on employment caused by the withdrawal of the land from production or the knock on impacts any losses may have on local services such as shops, schools and tradesmen.	ES Chapter 14: Socio-Economics and Land Use [APP-065] considers the effects of the Scheme on agricultural employment and, on a net basis, on employment and GVA in the wider study area. As set out in paragraph 14.4.11, the assessment estimates direct jobs associated with on-site activities and then applies a multiplier to reflect the number of indirect jobs associated with the supply chain and local services, following best practice guidance. The landowners in the Solar Development Areas farm the land themselves and will continue to generate income from it, and any contractors involved are not wholly reliant on the land. No material loss of agricultural employment is therefore anticipated. A more detailed assessment of indirect effects on businesses in the food chain and the farming support sector would require further research and consultation, which would not be proportionate. On this basis, it is considered reasonable to conclude that the Scheme would not have a significant effect on the wider

Reference	Topic	Matter Raised	Applicant's Response
			agricultural supply chain, or on local services such as shops, schools and tradesmen.
18.60		The well-developed interrelationships between land and communities in Lincolnshire is complex and extensive. The impact of the removal of land from production on these receptors is not assessed and this failure makes it impossible for the Secretary of State to take into account the economic and other benefits of that land, as required by the Overarching National Policy Statement for Energy (EN-1).	ES Chapter 14: Socio-Economics and Land Use [APP-065] assesses the socio-economic effects of the Scheme on employment, the local economy and the affected agricultural holdings, in accordance with Section 5.13 of EN-1. The Applicant has considered the relationship between the land and the local economy through this assessment, and concludes that the effects of the Scheme are not significant. ES Chapter 5: Agriculture and Soils [REP1-014] and ES Chapter 14: Socio-Economics and Land Use [APP-065] provide the Secretary of State with the information needed to take into account the economic and other benefits of the land under paragraph 5.11.34 of EN-1. The Applicant considers that further assessment of the proposed change of land use would not alter these conclusions and would not be proportionate.

3.19. Appendix ii: Meridian Solar Farm. Soils, Agriculture and Land Use Impact. Report of Reading Agricultural Consultants (RAC) August 2026 – APPENDIX 2: Review of ALC Survey Issues

Table 3-19: RAC Soils, Agriculture and Land Use Comments Appendix 2

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
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 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.	The Boston and Spalding District Soil Map was not specifically referenced within ES Appendix 5-2: Agricultural Land Classification Report – Parcels A and D [APP-172] and ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C [APP-173] (hereafter referred to as 'the ALC Survey Reports'). The assessment utilises the nationally recognised soil mapping datasets alongside published geological information from the British Geological Survey (BGS), which were considered appropriate and proportionate, and represent the information typically presented within Environmental Statements. In any event, reference to the Boston and Spalding District Soil Map would not materially alter the assessment conclusions. The soils	1) The Boston and Spalding (B&S) map provides much more detail than the National Soil Map and at 1:50,000 shows field boundaries. Although the National Soil Map is a nationally recognised data set, it is intended for use at strategic scale only and it should not be used to inform field scale investigations where more detailed published mapping is available (see Natural England's Guide to assessing development proposals on agricultural land - GOV.UK). The BSSS ALC validation process (https://soils.org.uk/wp-content/uploads/2022/02/Assessing-Agricultural-Land-Jan-2022.pdf) specifically asks whether published soil maps are mentioned in reporting and	The auger bore information available for purchase on LandIS contains only textures and colours. Some are incomplete. It is unnecessary to purchase data when a comprehensive field survey has been undertaken. Mapping may be used within desk based reconnaissance but it is inadequate for assessment of individual sites which is why the Applicant sought comprehensive field data. National scale soils mapping and 1:50,000 scale bedrock and superficial mapping is used. Wallasea Soils are usually wetness class III to IV when undrained. Whilst there is drainage

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	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. 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	whether the data are consistent with that expected for the area. 2) From the making of the B&S map there are many auger bores on the Landis Portal that cover the Meridian sites. These were available for purchase until March 2026, and are now freely available. They would have provided a useful comparative resource to inform a soil survey. 3) The question of the identification of a slowly permeable layer is dealt with in detail under Comment 2, below. 4) The statement that the Wallasea 2 Association is associated with soils exhibiting Wetness Class III to IV characteristics, which is consistent with the wetness assessment undertaken is incorrect in this part of Lincolnshire. The Bulletin accompanying the National Soil Map states (page 119) that these soils respond to under-drainage	infrastructure in the area of the Site, the evidence of wetness within the clay soils shows seasonal waterlogging. The LRA report identifies that soil permeability has been subject to deterioration under prolonged arable and horticultural use, the recent surveys identify the clay subsoils as firm and compacted, which is difficult to correct and so they have become slowly permeable and imperfectly-draining.

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	approximately 35 cm below ground level and extended to the maximum depth investigated (120 cm bgl). The horizon therefore forms an inherent and persistent component of the soil profile rather than a shallow cultivation-induced feature. 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 Guidelines¹. The conclusions presented therefore remain unchanged.	and drained soils are in Wetness Class (WC) II, but undrained soils are in WCIII and IV. This part of Lincolnshire comes within the South Holland Internal Drainage Board and water levels are controlled by a dense network of open drains controlled by pumping stations and sluices, into which field drains discharge. The proposed development area is one of the most intensively farmed parts of Britain and it is incomprehensible that none of the Wallasea soils have been under drained over the Meridian sites. Undrained Wallasea soils are found in the recently reclaimed Kent and Essex coastal marshes where the soils are still salt affected (sodic), causing clay particles to disperse and block drains. The B&S Memoir (page 3) explains that the last marine incursion in this part of Lincolnshire was over 2,000 years	

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
		ago, after which the land has been under freshwater and any salt remaining has been displaced.	
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 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	The survey methodology, including the excavation and assessment of soil inspection pits, was undertaken in accordance with the Guidelines and Field Survey Handbook. 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 the identified soil type in accordance with the MAFF Guidelines and Field Survey Handbook. 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	1) The claimed lack of porosity is a key argument in placing these soils in Grade 3b and this can only be judged from a soil pit, not with an auger. 2) The Meridian survey identifies four ALC grades – 1, 2, 3a and 3b - and yet there are only two generalised soil profiles summarised in the ES 6.3 Appendices 5.2 and 5.3. This is contrary to Natural England's Guide to assessing development proposals on agricultural land - GOV.UK) which state ALC surveyors should: • dig small inspection pits by hand to a minimum depth of 1m to add supporting evidence to the borehole data • dig pits where there's a change in main soil type	There is no minimum prescribed number of pits per hectare of the Site. Pits are dug per soil type and ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] were updated for Deadline 1 with further information regarding soil pits. Furthermore, the summary of constraints on ground conditions (severely restricting hand digging) were updated, also reviewing soils from archaeological trenches, where these were open at the time. The distribution of archaeological trenches was not targeted specifically for the study of soils and evidently, in the absence of an archaeologist watching brief, it was inappropriate for soil surveyors to extend the depth of excavation of the archaeological trenches.

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
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.	descriptions have now been provided. These demonstrate the basis upon which the soil types were identified and confirm the presence of the soil characteristics described within the assessment. It is acknowledged that soils developed in marine 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. The reviewer also suggests that laboratory testing of undisturbed	and ALC grade to provide a good depiction of the site 3) In June 2026, at LCC's request, Meridian provided seven soil pit descriptions with photos and locations, that were not included in the ES. Of these seven, only one reached the required depth of 1m; the others are 35cm, 40cm, 42cm, 50cm, 58cm and 62cm deep. A separate review of the individual soil pits is attached and only a summary is provided here. As well as being shallow, five of the seven pit faces are smeared flat with horizontal marks indicating they were excavated by a digger, possibly for an archaeological trench. A soil examination pit should be picked clean to expose the soil structure which clearly was not done here. 4) According to the Soil Survey Field Handbook (page 52) the percentage of macropores (i.e .visible pores) is estimated by	Whilst the depths reached did not extend to the target depths for standard soil pits, they did capture a transition from topsoil to subsoil. Soil pits from machinery are further scrapped by hand tools to reveal a cleaner soil profile and logged as standard. Photographic evidence of this is not a requirement and an absence of pictures/videos should not be taken as an omission of this method. Dried out soil profiles are sprayed with water. Munsell colours should not be taken from dry profiles. As above, absence of pictures should not be taken as an omission of this methodology. Images are not a requirement.

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	samples for density and porosity should have been undertaken. Whilst such investigations may provide supplementary information, they are not a requirement of the MAFF Agricultural Land Classification Guidelines or Field Survey Handbook 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. Accordingly, the conclusions presented are based upon field observations collected in accordance with established ALC survey procedures and are supported by the inspection pit and auger data.	examining the ped interior, with reference to the accompanying diagrams (Figs 19 – 22). This could not have been done on smeared pit faces where structure and consistence, let alone porosity, could not have been examined. 5) Natural England's Guidelines (see above) state that pits should be dug where there is a change in main soil type and ALC grade to provide a good depiction of the site. However, four of the seven pits are clustered in a 3b map unit in Area A, with only one pit each in Areas B, C and D. This pit distribution does not adequately reflect the changes in ALC grading across the four areas. Only Pit 1 is representative of Soil Type 1 in the ES; the remainder all approximating to Soil Type 2. If the pits are, in reality, shallow trenches excavated for another purpose (such as archaeology), then the choice of sites for profile descriptions is unlikely to be as	

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
		objective as it should be for an ALC survey over 1200 ha. 6) In terms of soil description, all soil type 2 profiles are described as ungleyed. And yet these soils approximate to the Wallasea series which is a pelo- alluvial gley soil. In the two unsmeared soil profiles where subsoil colours are visible, the subsoil is intensely gleyed, being pale grey with bright orange mottles and would certainly qualify as a Bg horizon.	
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	The assessment 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, which utilise a combination of auger borings and representative soil inspection pits. Within this methodology, auger borings provide the primary	LCC's response in Comment 2 details concerns about the value of Meridian's soil pits. The depth and frequency do not align with published methodology as the pits are too shallow, the faces are smeared, the descriptions incomplete and inaccurate as regards gleying. Also, the locations of the pits are not shown and none are geo-referenced.	For Deadline 1, ES Appendix 5-3 Agricultural Land Classification Report - Parcels B and C [REP1-030] and ES Appendix 5-2 Agricultural Land Classification Report - Parcels A and D [REP1-028] were updated to present grid references and a map. Refer to response above for other points raised.

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
with accuracy with an auger, without frequent pits.	means of assessing the spatial distribution and variability of soils across a site, whilst inspection pits are used to verify and characterise representative soil profiles in greater detail. 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.		
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	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	1) The frequently identical horizon depths and content is highly unusual and at odds with the varied auger logs presented in the LRA survey and those on the Landis Portal for this area. It is also at odds with the pit photographs which, where not	1. The LRA survey was less intensive and so distances between auger points were typically greater leading to differences in variability. 2. Whilst soil pits typically could not be extended to a full profile, because of ground conditions,

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
previous one. This is despite 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 3b which depend on identification of a slowly permeable horizon.	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. 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 repeated descriptors where no meaningful variation is observed between adjacent locations. This does not indicate duplication of records, but rather consistency in field observations. Where variation does occur within soil types, this is captured within the	smearred, show significant variations in topsoil depth and subsoil colour. 2) Slowly permeable horizons cannot be accurately identified in auger samples as subsoil structure and porosity, which are key to ALC grading, are distorted. Recognition of slowly permeable horizons has to be done by means of a sufficient number of profile pits to calibrate the auger descriptions, and LCC considers the pit descriptions are inadequate for this purpose.	they extended below the upper horizon allowing observations relating to the slowly permeable layer against which auger samples could be calibrated.

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	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. 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. The dataset as a whole demonstrates sufficient variation in key diagnostic parameters to support the soil type delineation and associated ALC grading,		

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	particularly in relation to identification of slowly permeable horizons.		
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% HCl was undertaken in accordance with the ALC guidance. 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. The ALC assessment was based on the field observations recorded in situ rather than an assumption that all	1) The presence of naturally occurring CaCO₃ can raise the ALC grade and should be tested and recorded in every sample where its presence is possible. The auger bores on Landis Portal have a significant proportion of calcareous clay soils (Newchurch series) with the frequency increasing eastwards towards Holbeach Drove. 2) These calcareous soils, even in the unlikely event of them being in Wetness Class III, would be in the BMV 3a subclass. However, it is important to note that the evidence from previous surveys is that these under drained heavy soils are in Wetness Class II, which puts them in Subgrade 3a, even if they are non calcareous (or Grade 2 if calcareous).	1. The Wallasea and Wishbech soils are noted as "calcareous in places" not uniformly calcareous. This finding has been confirmed by ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030], the earlier reconnaissance survey by LRA and the 1991 ALC MAFF survey. All found the majority of soils on site to be non calcareous. ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] were updated at Deadline 1 to clarify where the calcareous testing undertaken on site with 10% HCL yielded negative findings. The three most recent field surveys within the study area found mostly non-calcareous soils 2. The combination of Wetness Class III, Clay topsoil and Field Capacity Days <126 results in ALC

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	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. 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	3) Observations in soil science should be reproducible and replicable so that someone going back to the same geo-reference should be able to find the same or very similar profile characteristics. For this reason the CaCO₃ content should have been recorded in the auger and pit logs as it is an essential component of the ALC grading. Its beneficial effect on soil structure will also be an important component of the soil health assessment on decommissioning.	grade 3b, derived from table 6 of MAFF guidance. 3. Findings reported within ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030] align with the conclusions of other surveys within the site, from 1991 MAFF survey and the earlier LRA reconnaissance survey, in that all surveys acknowledge that the Site comprises non calcareous with some variably calcareous soils. The profiles on the LandIS portal are a mix of non-calcareous and some calcareous with the majority of topsoils on the LandIS AUGERProfile map within the Scheme recorded as non-calcareous.

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	confirmed non- calcareous conditions. 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.		
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	The reviewer has referred to a statement within the MAFF ALC Guidelines 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. In full context, the relevant section of the Guidelines states: "The grade	The primary purpose of this ALC survey is to assist with planning the siting of infrastructure, with particular reference to avoidance of long term damage to BMV land. It is not to do with identification of agronomically distinct areas that influence agricultural operations, so the issue of field boundaries is not relevant to an ALC survey for solar. In fact ES Figure 5.1 (auger by auger point survey results) confirms the areas	As previously stated, the assessment of effects undertaken within ES Chapter 5: Agriculture and Soils [REP1-014] is based on the auger-by-auger point analysis of ALC grades in order to present the worst-case assessment outcomes.

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
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".	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. 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" This section then goes on to describe limitations associated with variation and "patchwork soils" which complicate management and cropping. This statement sits within a wider methodological framework that requires point-based observations (auger and pit	of 3a land are large enough to stand-alone at the scale of mapping and there is no practical justification for merging them with 3b land.	

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	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) which advises to "Keep inclusions of land of a different grade to a minimum (unit impurities)". The approach adopted in this 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 discrete mapping units rather than being treated as individual isolated		

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	inclusions requiring separate delineation. 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. 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		

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	land. 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. 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. Notwithstanding the above, it is noted that both field-average and auger-by-auger point analyses		

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	were presented within the ALC Survey Reports and ES Chapter 5: Agriculture and Soils [APP-056], with the assessment of effects undertaken within ES Chapter 5: Agriculture and Soils [APP-056] being based on the auger-by-auger point analysis of ALC grades in order to present the worst-case assessment outcomes		
Why have Meridian contradicted an earlier ALC survey on MAGIC? 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 reviewer is available through the Natural England Access to Evidence database 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, soil logs, or other field data presented in accordance	1) Despite the lack of auger and pit descriptions, this post 1988 survey report does record the reason for the permeability of the clay subsoils and their being in Wetness Class II. Over the majority of the site soils have developed directly from marine alluvium and comprise clay, silty clay or occasionally clay loam topsoils over heavy clay occasionally silty clay subsoils (frequently the clay percentage of the clay topsoils exceeds 50%). Due to the presence of reed channels within the subsoil these	The conclusions of the 1991 report should be interpreted with caution given the significant gap of 35 years. Since this report the Site has been subject to intensive agricultural practices and compaction and climate change. A16 Crowland Bypass has also since been constructed through the area subject to the 1991 survey. Considerable time has elapsed since the survey of 1991. The presence of reed channels in this report is a brief reference with no log records, as well as the survey

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	with the MAFF Field Survey Handbook that would allow the basis of the grading decisions to be independently reviewed. 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. The ALC Survey Reports for the Scheme 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	profiles are permeable and free draining and are assessed mainly as wetness class II. (Wetness class II occurs where the subsoil reed channel network is intact, but damaged slightly immediately below the plough layer by continued cultivations, consequently causing some very slight impedance to subsoil drainage). 2) The reporting of old reed channels is a significant detail that is missing in the Meridian report and LCC does not agree that no robust technical comparison between the two assessments can be made. 3) On page 38 of the East of England Bulletin there is a detailed profile description of the Wallasea series which describes root channels at depth with a combination of subsoil structure and consistence that confirms there is no slowly permeable layer.	covering a very small portion of the total site area. Reed channels were not observed during the field surveys reported within ES Appendices 5-2 and 5-3 [REP1-028 and REP1-030].

RAC Question	Applicant's Response	RAC Clarification	Applicant's Response
	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.	This is the degree of detail that is to be expected in an ALC report for an NSIP.	

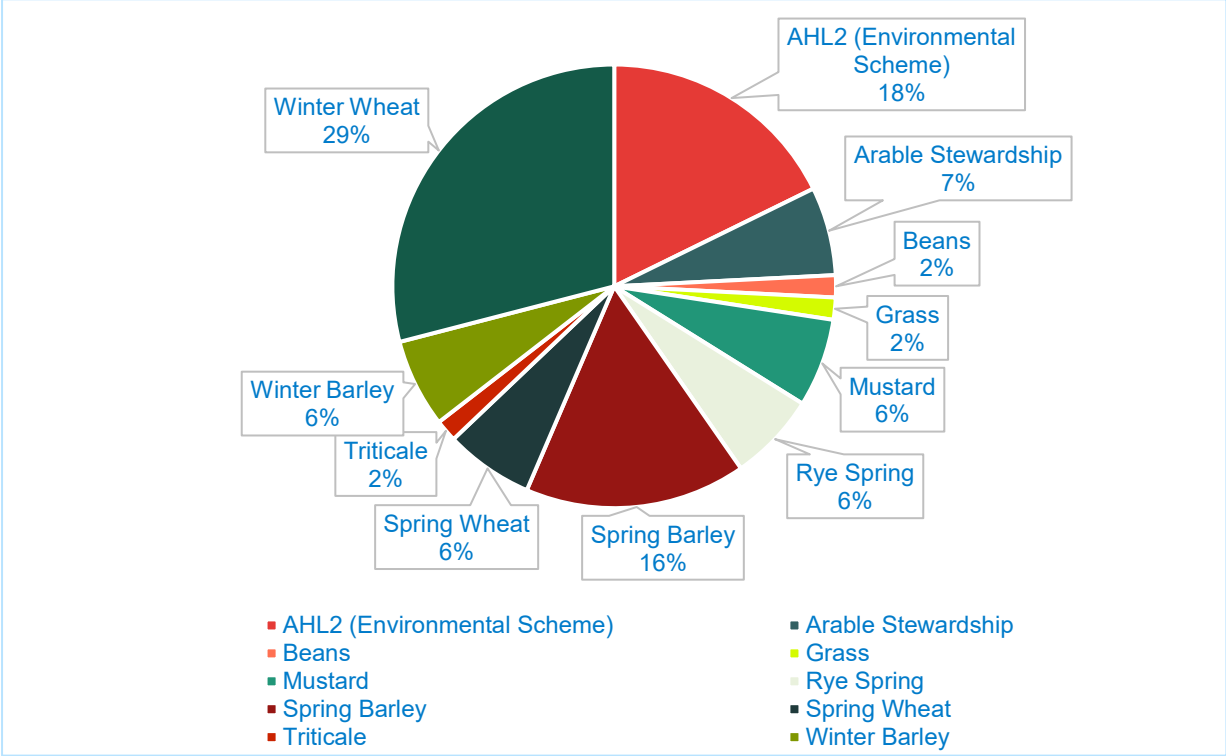
Appendix A: Field Parcels Cropping Information

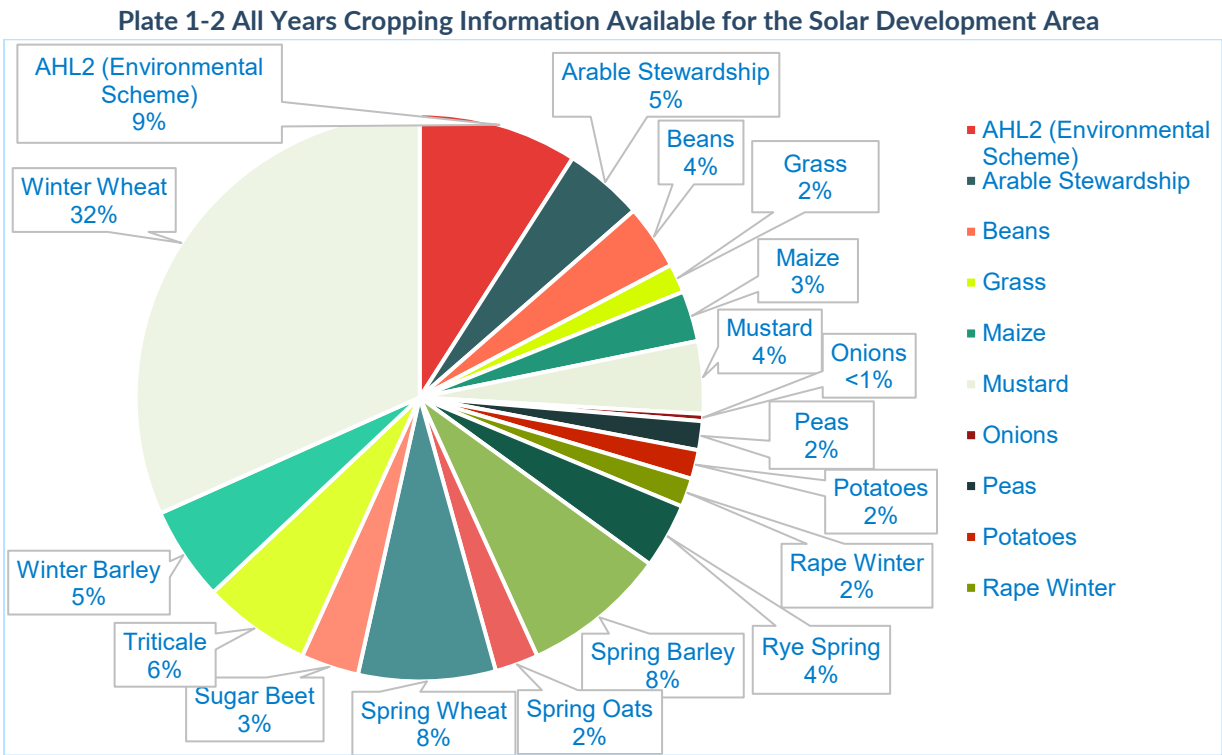
Appendix A: Cropping Information

1. Introduction

- 1.1.1. This Appendix includes available cropping information for the Solar Development Area since 2021. This report is supported by the following Annexes:
 - Annex A: Solar Development Area Cropping Information All Years;
 - Annex B: Land Parcel D Cropping and End Market Information.
- 1.1.2. Cropping data presented in Annex A is illustrated in pie chart for season 2025 in Plate 2-1. Year 2025 provides a comprehensive recent dataset across the Solar Development Area. Percentages of crop reflect the area of land allocated for each crop within the Solar Development Area.
- 1.1.3. A pie chart is also presented in Plate 2-2 to illustrate Annex A cropping data across the five-year period between 2021-2026, however, data was not available for all land parcels for all years. The information is expressed, therefore, as a percentage of land within the Solar Development Area of the Scheme.

Plate 1-1 2025 Cropping Information Available for the Solar Development Area





2. Summary of Information

- 2.1.1. Cropping is dominated by cereals. Within the cereal production, the split between winter and spring sown crops is notable. Reasons may include spreading labour requirements over a longer period but typically spring crops are sown as a strategy for managing wet soils, reducing the risk of compaction and smearing from agricultural machinery.
- 2.1.2. In the most recent complete year of cropping data for 2025, a quarter of the land was in some form of environmental management and not producing crops. It is also anticipated that the use of mustard is as a cover crop (not harvested) to improve soil condition.
- 2.1.3. Market information is only available for Land Parcel D. Where information on markets has been provided, cereals are supplied exclusively into the animal fodder and energy market. Similarly, the small area of beans is for animal fodder.

Market data is not available for all land parcels. In terms of likely cereal end use; some wheat and barley may be used for flour and brewing but there was no confirmed use of grains for these products. Other cropping, notably maize, is entirely for bio-digestion for energy.

- 2.1.4. In 2025, there was no high value root vegetable production.
- 2.1.5. In the five-year period 2021-2026 (which includes some gaps within the data), there was some root and vegetable production. A combined total of five per cent of the land was used for sugar beet and potatoes. A further two per cent was used to grow peas. This is assumed to be vining peas for human food production but may be an animal fodder crop, similar to the field beans. Over this five-year period the balance between winter and spring grown cereals was more weighted to winter varieties than in 2025. The area ratio was approximately 2:1 for winter to spring varieties but this identifies that the need to avoid wet land was not a result of exceptional conditions in a single year.

3. Conclusion

- 3.1.1. While not definitive, the cropping data provides considerable support for the soils and land data presented within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030], indicating restrictions to workability of large parts of the Solar Development Area. There was a relatively small area of land cropped for the human food chain, which generally command higher prices. Whilst there are also social and economic factors in cropping decisions, taken together the following bullet points align with assessment within **ES Chapter 5: Agriculture and Soils [REP1-014]** that identifies a mixture of best and most versatile (BMV) land (Grades 1 and 2 and Subgrade 3a) and other land that is non-BMV (Subgrade 3b). These indicators are:
- Limited cropping of high value root and vegetable crops for the human food chain;
 - Significant areas of spring sown cereals, indicative of soil wetness constraints;
 - Landowner identified use of winter and spring sown cereals for lower value animal fodder and energy (with no confirmation of grains for products for human consumption);

- Other animal fodder and energy crops, including beans and maize;
- Cover cropping for soil improvement; and,
- Increasing diversion of land to environmental schemes, reaching a quarter of the land area.

Annex A Solar Development Area Cropping Information

Solar Development Area Field Number	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
B-1-09	Not Available	Rye Spring	Winter Wheat	Not Available	Winter Wheat	Rye Spring
B-3-01	Not Available	Winter Wheat	Not Available	Winter Wheat	Rape Winter	Winter Wheat
B-5	Not Available	Beans	Arable Stewardship	Winter Wheat	Not Available	Winter Barley
	Not Available	Arable Stewardship	Spring Barley	Rye Spring	Winter Wheat	Winter Barley
	Not Available	Arable Stewardship	Spring Barley	Rye Spring	Winter Wheat	Rape Winter
D-3-01	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Spring Oats	Maize	Not Available	Maize
D-1-02	Triticale	Spring Wheat	Winter Wheat	Triticale	Winter Wheat	Maize

Solar Development Area Field Number	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
C-1-03	Peas	Winter Wheat	Mustard	Winter Barley	Winter Wheat	Sugar Beet
	Peas	Winter Wheat	Mustard	Winter Barley	Winter Wheat	Sugar Beet
C-2-03	Winter Wheat	Mustard	Spring Barley	Beans	Winter Wheat	Winter Wheat
D-4	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Triticale	Spring Wheat	Not Available	Triticale
D-2-04	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Winter Wheat	Not Available	Triticale
A-1-02	Not Available	Winter Wheat	Not Available	Not Available	Not Available	Not Available
A-1-04	Not Available	Winter Barley	Not Available	Not Available	Not Available	Not Available

Solar Development Area Field Number	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
A-1-03	Not Available	AHL2 (Environmental Scheme)	Not Available	Not Available	Not Available	Not Available
A-1-09	Not Available	AHL2 (Environmental Scheme)	Not Available	Not Available	Not Available	Not Available
A-1-10	Not Available	Winter Barley	Not Available	Not Available	Not Available	Not Available
A-1-11	Not Available	Winter Wheat	Not Available	Not Available	Not Available	Not Available
B-1-12	Not Available	Rye Spring	Winter Wheat	Arable Stewardship	Arable Stewardship	Arable Stewardship
B-1-03	Not Available	Spring Barley	Not Available	Not Available	Not Available	Not Available
B-1-11	Not Available	Spring Barley	Rye Spring	Winter Wheat	Winter Barley	Winter Wheat
B-1-01	Not Available	Spring Barley	Not Available	Not Available	Not Available	Not Available

Solar Development Area Field Number	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
B-1-07	Not Available	Spring Barley	Not Available	Not Available	Not Available	Not Available
B-1-06	Not Available	Spring Barley	Not Available	Not Available	Not Available	Not Available
B-1-02	Not Available	Spring Barley	Rye Spring	Winter Wheat	Not Available	Not Available
B-1-08	Not Available	Spring Barley	Not Available	Not Available	Rape Winter	Rape Winter
B-1-14	Not Available	Arable Stewardship	Not Available	Not Available	Not Available	Not Available
B-1-10	Not Available	Rye Spring	Winter Wheat	Sugar Beet	Winter Barley	Winter Wheat
B-1-13	Not Available	Arable Stewardship	Not Available	Not Available	Not Available	Not Available
C-2-01	Winter Wheat	Mustard	Spring Barley	Beans	Winter Wheat	Winter Wheat
C-2-02	Winter Wheat	Winter Wheat	Mustard	Winter Wheat	Beans	Winter Wheat
C-1-08	Peas	Winter Wheat	Potatoes	Spring Barley	Sugar Beet	Winter Wheat

Solar Development Area Field Number	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
	Winter Wheat	Mustard	Winter Wheat	Onions	Winter Wheat	Potatoes
	Potatoes	Spring Barley	Sugar Beet	Winter Wheat	Beans	Winter Wheat
C-1-02	Winter Wheat	Mustard	Spring Barley	Beans	Winter Wheat	Sugar Beet
C-1-01	Spring Barley	Spring Barley	Spring Barley	Sugar Beet	Winter Wheat	Winter Wheat
C-1-06	Peas	Winter Wheat	Mustard	Winter Barley	Winter Wheat	Winter Wheat
C-1-05	Not Available	Winter Wheat	Mustard	Winter Barley	Winter Wheat	Beans
C-1-04	Not Available	Winter Wheat	Mustard	Winter Barley	Winter Wheat	Beans
D-5-02	Winter Wheat	Triticale	Triticale	Spring Oats	Not Available	Triticale
D-3-05	Spring Wheat	Winter Wheat	Spring Oats	Maize	Not Available	Spring Barley
D-3-02	Triticale	Winter Wheat	Spring Wheat	Winter Wheat	Not Available	Maize

Solar Development Area Field Number	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
D-3-03	Triticale	Spring Wheat	Spring Wheat	Winter Wheat	Not Available	Triticale
D-3-04	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Not Available	Spring Oats
D-2-01	Spring Wheat	Winter Wheat	Winter Wheat	Winter Wheat	Not Available	Spring Oats
D-2-03	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Winter Wheat	Not Available	Not Available
D-1-03	Spring Wheat	Winter Wheat	Triticale	Spring Wheat	Not Available	Maize
D-1-01	Triticale	Winter Wheat	Triticale	Spring Oats	Winter Wheat	Maize
A-1-07	Not Available	Winter Barley	Not Available	Not Available	Not Available	Not Available
A-1-01	Not Available	AHL2 (Environmental Scheme)	Not Available	Not Available	Not Available	Not Available

Solar Development Area Field Number	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
A-1-05	Not Available	AHL2 (Environmental Scheme)	Not Available	Not Available	Not Available	Not Available
A-1-12	Not Available	Winter Wheat	Not Available	Not Available	Not Available	Not Available
A-1-08	Not Available	AHL2 (Environmental Scheme)	Not Available	Not Available	Not Available	Not Available
A-1-06	Not Available	Winter Barley	Not Available	Not Available	Not Available	Not Available
B-3-02	Not Available	Rye Spring	Winter Wheat	Arable Stewardship	Arable Stewardship	Arable Stewardship
C-2-05	Grass	Grass	Grass	Grass	Not Available	Not Available
C-1-07	Potatoes	Spring Barley	Sugar Beet	Winter Wheat	Beans	Winter Wheat

Solar Development Area Field Number	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
D-6	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Spring Wheat	Spring Wheat	Not Available	Winter Wheat
	Triticale	Winter Wheat	Spring Wheat	Spring Wheat	Not Available	Winter Wheat
D-5-01	Winter Wheat	Spring Wheat	Spring Wheat	Winter Wheat	Not Available	Winter Wheat
	AHL2 (Environmental Scheme)	Spring Wheat	Spring Wheat	Winter Wheat	Not Available	Winter Wheat
D-3-06	Spring Wheat	Winter Wheat	Spring Wheat	Winter Wheat	Not Available	Spring Barley

Annex B – Land Parcel D Cropping and End Market Information

Land Parcel D	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
D-3-01	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Spring Oats (Feed)	Maize (Energy - Biogas)	Not Available	Maize (Energy)
D-1-02	Triticale (Energy / Biogas)	Spring Wheat (Feed)	Winter Wheat (Feed)	Winter Triticale (Energy/Biogas)	Winter Wheat (Feed)	Maize (Energy)
D-4	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Forage Triticale (Energy - Biogas)	Spring Wheat and Spring Oats (Feed)	Not Available	Triticale (Energy)
D-2-04	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Winter Wheat (Feed)	Not Available	Triticale (Energy)
D-5-02	Winter Wheat (Feed)	Winter Wheat (Feed)	Forage Triticale (Energy Biogas)	Spring Oats (Feed)	Not Available	Triticale (Energy)
D-3-05	Spring Wheat (Feed)	Winter Wheat (Feed)	Spring Oats (Feed)	Maize (Energy - Biogas)	Not Available	Spring Barley (Feed)

Land Parcel D	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
D-3-02	Triticale (Energy Biogas)	Winter Wheat (Feed)	Spring Wheat (Feed)	Winter Wheat (Feed)	Not Available	Maize (Energy)
D-3-03	Triticale (Energy/Biogas)	Spring Wheat (Feed)	Spring Wheat (Feed)	Winter Wheat (Feed)	Not Available	Triticale (Energy)
D-3-04	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Not Available	Spring Oats (Feed)
D-2-01	Spring Wheat (Feed)	Winter Wheat (Feed)	Winter Wheat (Feed)	Winter Wheat (Feed)	Not Available	Spring Oats (Feed)
D-2-03	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Winter Wheat (Feed)	Not Available	Not Available
D-1-03	Spring Wheat (Feed)	Winter Wheat (Feed)	Triticale (Energy/Biogas)	Spring Wheat (Feed)	Not Available	Maize (Energy)
D-1-01	Triticale (Energy/Biogas)	Winter Wheat (Feed)	Triticale (Energy/Biogas)	Spring Oats (Feed)	Winter Wheat (Feed)	Maize (Energy)

Land Parcel D	2026 Cropping	2025 Cropping	2024 Cropping	2023 Cropping	2022 Cropping	2021 Cropping
D-6	AHL2 (Environmental Scheme)	AHL2 (Environmental Scheme)	Spring Wheat (Feed)	Spring Wheat (Feed)	Not Available	Winter Wheat (Feed)
	Triticale (Energy - Biogas)	Winter Wheat (Feed)	Spring Wheat (Feed)	Spring Wheat (Feed)	Not Available	Winter Wheat (Feed)
D-5-01	Winter Wheat (Feed)	Spring Wheat (Feed)	Spring Wheat (Feed)	Winter Wheat (Feed)	Not Available	Winter Wheat (Feed)
	AHL2 (Environmental Scheme)	Spring Wheat (Feed)	Spring Wheat (Feed)	Winter Wheat (Feed)	Not Available	Winter Wheat (Feed)
D-3-06	Spring Wheat (Feed)	Winter Wheat (Feed)	Spring Wheat (Feed)	Winter Wheat (Feed)	Not Available	Spring Barley (Feed)

