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| Q1.0.4 | **National Planning Policy Framework** Since the submission of the application, the National Planning Policy Framework (NPPF) has been updated. Please consider whether this evolves your case and, if so, provide an updated assessment of the proposed development against the most recent version of the NPPF. | LCC considers this question refers to the adopted 2024 NPPF and the updated adopted 2026 NPPF and the changes between these documents and does not relate to the changes between the adopted 2026 NPPF and the consultation draft of this document released in 2025.<br><br>LCC anticipates the applicant will provide an update with regard to policy compliance within their documentation and LCC will provide commentary on this in due course.<br><br>LCC would highlight the alterations to heritage policies within the updated NPPF specifically HE4 to HE7. In summary, all harm is now given 'considerable importance and weight', archaeology and non-designed heritage assets considerations are particularly stronger.<br><br>**HE4(2)** now states any harm or loss to a designated asset requires clear and convincing justification, including from development within it setting.<br><br>**HE5(5)** archaeological assessment is no longer simply evidence gathering and it should influence the design, mitigation and implementation. As LCC has stated within our representations to date.<br><br>**HE6(3)** August 2026 version contains a new explicit statement that harm carries considerable importance and weight. Effectively a new step has been added, decision makers must 1) identify the harm, 2) attach considerable weight to it, 3) then weigh the public benefits.<br><br>There is also a shift from whether the development is necessary to whether the heritage harm itself is necessary, see **HE6(5)**.<br><br>The introduction of footnote 64 in relation to non-designated heritage assets should also be noted.<br><br>Overall, it is not considered that the updated NPPF (2026) fundamentally alters LCCs case, however we would highlight the changes with regard to heritage matters as referenced above and would argue that these policies strengthen LCCs position. Particularly with reference to HE6(3) which is not reflective of the current policy stance within the NPSs. |
| Q6.0.17 | **Scope and purpose of the Compulsory Acquisition powers** Are you aware of: • Any reasonable alternatives to CA or TP for land sought by the applicant? • Any areas of land or rights that the applicant is seeking the powers to acquire that you consider would not be needed? If so, please identify which plots these are and explain why you consider they would not need to be acquired. | LCC is not aware of anything relevant in this regard with respect to County Farm land holdings.<br><br>However, with respect to highways land, the applicant should justify why CA powers are necessary when highway works can be under through other means. As the Highways Authority, LCC considers the Applicant should not be seeking CA of Highway Land. Highways land is public land and would be available for the applicant to utilise for the purposes of the development subject to obtaining the requisite permitting and technical approvals from LCC. No acquisition would be required. LCC would oppose any CA of highways land as verges are required for maintenance purposes, by both the Highways Authority and by other relevant undertakers where their assets and services (e.g. water, broadband etc) run through or along highway verges.<br><br>Due to time constraints, LCC has been unable to provide a more detailed response at this stage. However, we respectfully reserve the right to submit further comments as necessary in subsequent written submissions, following continued consultation with the Highway Authority on this matter and/or at the request of the ExA. |
| Q6.3.1 | **Section 131 and Section 132 of PA2008** Are the local authorities aware of any irregularities in the applicant's CA documents with regards to the classification of land, particularly with regards to s131 and s132 of PA2008? If so, explain with reasons. | Having reviewed the documentation relating to classification of land with specific reference to s131 and s132 of the PA2008, our understanding is that this relates to the strip of common land along the eastern of Martin's Road. On this basis, and with reference to the information presented in the application, LCC has no further comments to make in this regard |

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| Q7.1.5 | **Part 3 Article 11 (Power to alter layout, etc., of streets)** Article 11 provides power to carry out works permanently to streets specified in column 2 of the table at schedule 5. Please comment if LCC have any concerns regarding the approach being taken. | 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.<br><br>LCC expect the need for such further approvals to be included in the DCO application and it has been suggested this could be through the outline CTMP and the final CTMP to be approved by the Council under requirement 15 of the draft DCO. Wording to this effect should be included in outline CTMP as suggested in section 11 of LCC's LIR. |
| Q7.1.9 | **Part 3 Article 17 (Traffic regulation measures)** Article 17(1)(a) seems to suggest the applicant can impose traffic restrictions on any road, regardless of whether it is within the OL or not. Please clarify the situation and, if that is what is intended, justify the scope of the powers sought. | Works in the highway need to be undertaken with a Permit (Article 10) and LCC's LIR suggested changes to Article 10 wording. |
| Q7.1.10 | **Part 3 Article 17 (Traffic regulation measures)** Please confirm whether LCC is satisfied with the time periods specified in article 17(5)(a)(b) and (c) of the dDCO. If not, please provide an explanation. | The proposed time periods in article 17(5)(a)(b) and (c) of the dDCO are acceptable to the Highway Authority. |
| Q7.2.10 | **Schedule 1 Article 3 To LCC** and SHDC: At the end of schedule 1 of the dDCO [REP1-006], a list of associated development is provided in connection with Works Nos. 1 to 16. Please confirm whether you are satisfied in how this detail is presented and whether it provides sufficient clarity as to the scope of the proposed development. | Having reviewed the list of associated developments (a) to (s) at the end of Schedule 1, LCC consider that the scope of works and level of detail provided is comparable to other solar DCOs and therefore we have no further comments to make at this stage of the Examination. We would however wish to reserve the right to review and comment accordingly should any changes be made to this part of the draft DCO. |
| Q7.3.2 | **Construction working hours** To the applicant - The ExA notes that the dDCO [REP1-006] does not appear to include a requirement specifically controlling working hours. Whilst it is noted that working hours is dealt with in section 2.4 of the Outline Construction Environmental Management Plan (OCEMP) [REP1-061], please provide an explanation as to why such a requirement has not been included in the dDCO. **To LCC** and SHDC – Please confirm whether such a requirement is necessary? If not, please justify. | Subject to the final CEMP clearly setting out working hours and the submission and approval of the final CEMP being secured through a requirement LCC has no objection to the applicant's approach. This approach would be consistent with other made solar DCOs in Lincolnshire. LCC would request that working hours are covered in the CTMP as well. |
| Q7.3.13 | **Requirement 20 (Skills, supply chain and employment)** Please review R20(3) and confirm whether the wording is necessary. | LCC has reviewed the wording of Requirement 20(3) and considers that the inclusion of this wording is consistent with other made solar DCOs in Lincolnshire. It also provides clarity on the face of the DCO as to the matters that the plan is expected to identify and address. |
| Q7.4.1 | **Disapplication of legislative provisions** Article 7, together with schedule 3, of the dDCO [REP1-006] relate to the disapplication of legislative provisions. Set out whether there are any anomalies on the list, whether there is any disagreement in respect of any provision being disapplied and set out any reasons behind this disagreement, if any exist. | LCC has no comments to make on the list and it is consistent with other solar DCO's in Lincolnshire. |
| Q9.0.1 | **Adequacy of surveys** Concerns have been raised regarding the adequacy of ecological surveys by several IPs, including LCC [REP1-082] and Lincolnshire Wildlife Trust (LWT) [REP1-088]. The applicant's response to these concerns is noted, for example [REP1-074], [REP2-015] and [REP1-088]. Can all parties provide a clear statement of their current position on this matter in the context of up-to-date policy and guidance. | LCC has reviewed the Applicant's responses to matters raised in the Local Impact Reports (REP1-074 and REP2-015) and maintains its position that additional surveys are required in order to ensure that potential impacts on nocturnal Schedule 1 breeding birds such as barn owl are identified and to properly understand mitigation requirements.<br><br>LCC has also stated its position that, where access for surveys to accurately determine the condition of habitats has not been possible, the condition should be assigned as 'Good' in the Statutory Biodiversity Metric where enhancements to condition are proposed on unsurveyed land.<br><br>With the exception of these points LCC considers that the level of ecological survey is adequate. |

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| Q9.0.2 | **Skylark (and other ground nesting birds)** The applicant has estimated that there are approximately 50 skylark territories [REP1-088] and proposes a total of approximately 280ha of land for use as skylark plots, which is equivalent to around 0.2 territories per hectare. Do you agree: - That the estimation of the number of skylark territories is appropriate and assessed in line with current policy and guidance. If not, why not? - That the proposal for 0.2 territories per hectare is consistent with current policy and guidance. If not, why not? ExQ1 Question to: Question: - Are you satisfied that the proposals have adequately addressed LWT's concern that there is no clear evidence of skylark territories on solar farms and that unbroken lines of sight are required? If not, please outline what you consider to be required. - Both the County Council and Wildlife Trust have stated that additional information is required to confirm that the mitigation strategy is adequate. Please set out what you consider to be outstanding, with reference to current policy and guidance. | LCC notes the Applicant's response to Lincolnshire Wildlife Trust at REP1-074, Table 5-6 in relation to the production of a Farmland Bird mitigation Strategy and welcomes the additional clarification provided.<br><br>LCC considers that, subject to successful habitat establishment and effective management, the mitigation proposed by the Applicant for ground-nesting farmland birds is likely to adequately mitigate adverse impacts on these species, including skylark. |
| Q9.0.3 | **Lake effects** In the Relevant Representations Report [REP1-074], the applicant states that UK research on the effects of the "ecological lake effect" is limited. It says its ornithological assessment used the best available information, and that the breeding and winter bird survey methodologies were discussed and agreed with Natural England (NE). The applicant therefore considers that there has been a robust assessment of the solar development and concludes that no significant residual adverse effects are expected. Please could the parties confirm that they agree with this statement and if not, why not? | With the exception of the requirement for nocturnal surveys for Schedule 1 species such as barn owl raised at Q9.0.1 LCC considers that the level of ornithological survey has been adequate.<br><br>LCC has also raised concerns in relation to the identification of Functionally Linked Land (FLL) in REP2-022 and notes that Natural England has raised similar concerns in REP2- 025. LCC therefore considers that additional assessment, analysis and/or justification is required in order to determine whether the significant adverse effects are likely. |
| Q11.0.9 | **HRA implications of permitted preliminary works** The applicant has provided a response [AS-028] to the s51 advice issued at acceptance [PD-002] in relation to the definitions and scope of "commence" and "permitted preliminary works" within the dDCO [REP1-006]. The applicant, NE and all IPs are invited to provide comments on whether there are any implications for the conclusions of the HRA Report [REP1-042] as a result of this scope and definitions. | LCC have no comments to make with regard to Habitats Regulations Assessments and will defer to Natural England. |
| Q11.0.10 | **HRA implications of the variable grid connection** The applicant has provided a "Sensitivity Analysis" [AS-029] for the assessment of LSE in the event of a delay in the delivery of the proposed development from that assumed in the assessment scenarios (as outlined in table 4-2 of ES Chapter 4: Overview of the Environmental Impact Assessment (EIA) Process [APP-055]). The applicant, NE and all IPs are invited to provide comments on whether there are any implications for the conclusions of the HRA Report [REP1-042] as a result of the variable grid connection date and findings of the sensitivity analysis. | LCC have no comments to make with regard to Habitats Regulations Assessments and will defer to Natural England. |
| Q11.0.11 | **HRA implications of the optionality of Work No. 14** The applicant has provided an assessment summary of Work No. 14 [AS-030], as options for both overhead and underground cables are included within the dDCO [REP1-006]. The applicant, NE and all IPs are invited to provide comments on whether there are any implications for the conclusions of the HRA Report [REP1-042] as a result of the optionality of Work No. 14. | LCC have no comments to make with regard to Habitats Regulations Assessments and will defer to Natural England. |
| Q12.0.4 | **Embedded mitigation** To the applicant: A 20m buffer zone has been provided around two scheduled monuments within the OL. Please signpost to a figure | LCC would consider 20m an appropriate buffer zone under the condition that the demarcation was formed by a robust physical boundary restricting accidental entry and should be in place for the duration of the scheme |

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| | where the buffer zone is shown. **To LCC** and Historic England (HE): Please confirm whether a 20m buffer zone is considered acceptable. | life including decommissioning. Scheduled Monuments are nationally significant and harm should always be avoided where possible. |
| Q12.0.14 | **Archaeology – construction phase** ExQ1 Question to: Question: Paragraph 8.9.30 of ES Chapter 8 [REP1-016] explains that due to the high groundwater table across the OL, it is likely that dewatering of excavations would be required. Are LCC satisfied with the conclusions drawn. | We are in broad agreement on the direct dewatering impacts, with the probability being only relatively minor harm. However, the potential cumulative impact arising from the dewatering in combination with the long-term climatic change may result in accelerated deterioration of palaeo-environmental deposits. Recent work at the nearby Flag Fen site has highlighted the damage that climate change and dewatering can have and although remains of that significance are not anticipated here, the same types of impact may well arise, hastening and exacerbating the deterioration. It is recommended that effective long-term monitoring of hydrology is included and that the data gathered is provided to the Archaeological Clerk of Works (ACoW) to ensure appropriate oversight and, if required, implement solutions to mitigate any harm. |
| Q12.0.17 | **Archaeology – decommissioning phase** Concerns regarding potential impacts on archaeological assets during the decommissioning phase have been raised by LCC within their LIR [REP1-106] and their DL2 response [REP2-022], in particular that removal of ground concrete foundations and soil decompaction. The ExA note the Applicant's Comments on Local Impact Reports [REP2-015] that the OAMMS [REP1-078] provides for decommissioning methods to be reviewed against the archaeological potential of the site to determine an appropriate and proportionate approach to archaeological mitigation. Please confirm whether the approach detailed within the OAMMS adequately addresses the concerns raised by LCC regarding the assessment of heritage impacts during decommissioning and how such concerns would be addressed within the Outline Soil Management Plan (OSMP) [REP1-068]. | LCC would consider a more robust statement on securing the need for adequate archaeological mitigation, as appropriate, during the decommissioning phase to be warranted. However, we recognise the uncertainty inherent in establishing anything but relatively broad principles for actions that will take place over forty years in the future. We would recommend that the role of the ACoW also covers the operational and decommissioning phases and that this is embedded within the role specification and included in the final AMMS. |
| Q12.0.22 | **Historic Environmental Desk Based Assessment** Paragraph 4.9.2 of the HEDBA [APP-182] states that due to traffic management measures needed for Holbeach Drove Gate and Langary Gate Road, the 1km study limit does not extend a further 1km from the most southern point of the revised Order limits as it already provides an adequate baseline data for an assessment of effects. Please comment on this approach taken by the applicant for these two roads. | LCC have no objection to this approach and agrees that the baseline data collected is adequate. |
| Q12.0.24 | **Historic Environmental Desk Based Assessment** Paragraph 4.9.7 of the HEDBA [APP-182] states archaeological evaluation of the inter-array connection between parcels A and B would be undertaken once the details of the excavation required for the underground cable is known. The paragraph also states for the inter-array between parcels C and D, no archaeological evaluation is to be conducted and mitigation measures would be provided in the OAMMS [REP1-078]. To the applicant: Please confirm when archaeological evaluation works for the inter-array between parcels A and B are anticipated to be conducted. **To LCC**: Please comment on the approach taken for the inter-array between parcels C and D for archaeological evaluation. | Once a route and/or pylon locations have been determined, LCC would expect intrusive field evaluation to occur. When non-intrusive surveys are done well, this can allow intrusive field survey to be done at a later, potentially post-consent, phase. The route between parcels C and D is OHL. Therefore, we agree that standard field evaluation would not be appropriate except within the areas of ground disturbance. The OAMMS includes post-determination geophysical survey and trial trenching of the inter-array connection areas as mitigation and assuming that geophysical survey is undertaken in advance of final location design of the pylon bases, this approach is acceptable to LCC. |
| Q12.0.26 | **Historic Environmental Desk Based Assessment** Please comment on the conclusions drawn in paragraph 6.1.19 of the HEDBA [APP-182] that there is considered to be a low potential to encounter remains from early medieval and medieval period in the GCR and IAC areas given the details provided in the proceeding paragraphs. | Settlement during the early medieval and Medieval periods likely continued and formed into the extant settlements seen today with surrounding areas proposed for the Meridian scheme continuing in agricultural and salt production activities, as indicated in the Lincolnshire Historic Environment Record and the archaeological trial trenching undertaken to date. Much of the evidence found is for field systems and drainage. However, concentrations of pottery may indicate a higher potential for either settlement or other non-agricultural activities, albeit that this is still on the lower end of the scale of potential. Consequently, this assessment would not substantially differ from what we would conclude with the same evidence. |

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| Q13.0.1 | **Need for Health Impact Assessment** LCC has requested a Health Impact Assessment (HIA) stating that this would provide a more robust and transparent evaluation [REP1-106]. The applicant has responded to say that its assessment has been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) (now (ISEP) guidance and that a comprehensive HIA would not be proportionate or effective [REP1-074]. Please can LCC: • Confirm if the human health assessment [APP-061] meets the requirements of the up-to-date guidance. • Signpost to the policy requirement for an HIA. • If not required by policy, explain why it is required in this case and how undertaking an HIA is proportionate to the identified risks. | The request for a Health Impact Assessment (HIA) was just that rather than a requirement. However, the request is in line with Policy S54 (Health and Wellbeing) in the Central Lincolnshire Local Plan, which requires a HIA to accompany planning applications for non-residential developments of 5 hectares or more. Officers in LCC's Public Health team are not familiar with the Institute of Environmental Management and Assessment (IEMA) guidance and are therefore unable to comment on whether the human health assessment [APP-061] meets the requirements of it or not. Public Health accepts APP-061 as a desktop exercise in the absence of a HIA. Carrying out a comprehensive HIA would have involved community members and stakeholders in its production and carried more weight on proposed community benefits and mitigate identified risks. |
| Q13.0.2 | **Assessment of human health, including effects of electric and magnetic fields** LCC has requested that the human health assessment considers vulnerable populations, controls during the construction phase, a full assessment of the effects on mental wellbeing, whether the effects of electric and magnetic fields (EMF) will comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines and maximisation of health and access opportunities [REP1-106]. In [REP1-074] the applicant has signposted to where these issues are assessed in the application, including reference to the EMF Compliance Report [APP-273] Following review of the applicant's response, please can LCC confirm that the assessment provided is sufficient to address its concerns and, if not, explain what else is required and why? | LCC's Public Health team is satisfied with the EMF Compliance Report [APP-273] conclusion that there is full compliance with exposure limits and that cumulative effects of Electromagnetic Fields (EMFs). Consideration of vulnerable populations and an assessment of the effects on mental wellbeing are contained in the Environmental Statement (ES) Chapter 10: Human Health for each phase of the development, including perceived risks. Potential nuisance such as poor air quality, dust and odour are matters for the North Kesteven District Council Environmental Protection team. LCC notes these issues are covered in the ES. Mitigation is to be through community communication exercises and a Community Liaison Group maintained throughout construction, operation, and decommissioning, which LCC confirms is sufficient. |
| Q14.0.1 | **Cropping information To LCC** - Does the information provided within appendix A of the 'Applicant's Comments on Local Impact Report' [REP2-015], provide sufficient detail on cropping patterns and agricultural production to enable a robust assessment of the effects of the proposed development? If not, please explain why To the applicant – The content of appendix A of the 'Applicant's Comments on Local Impact Report' [REP2-015] is noted. However, given that market data is only available for land parcel D, explain how this information is sufficiently detailed to assess the effects of the proposed development? Please also identify and provide a plan showing land which would form part of the proposed development which currently benefits from irrigation. | RAC have provided the following response on behalf of LCC.<br><br>The information provided at Appendix A of the 'Applicant's Comments on Local Impact Reports' **[**EN010169-000683-8.3**]** fails to provide detail of typical cropping patterns and agricultural production to enable a robust assessment of the proposed development.<br>Appendix A sets out cropping information for parts of the Solar Development Area over the past six years. Of 480 possible records for individual fields, 146 are marked "*Not Available*". Whilst the appendix provides an indication of what was growing when and where records are available for the specific area, it only covers 69.6% of all possible records.<br>Those parts of the solar development area with records appear to be limited, with records of only 71 fields, which may contain split cropping in any year; 12 in Area A, 15 in Area B, 12 in Area C and 32 in Area D. It is not clear from the record how the sample is made up, in terms of either distribution across or proportion of the proposed Development Area and so cannot be assumed to be representative of the cropping across the area, or what the area has capacity to grow.<br><br>Planning permission attaches to and runs with land, regardless of ownership or management. Land use therefore should not be considered in the context of historical management but of its potential, which can either be evaluated through an accurate ALC survey or by considering historical land use on comparable, contiguous land. Historical land use and associated outputs have been excluded from land assessment because of difficulties in obtaining reliable, long-term records. Developments in remote sensing have made it possible to accurately map cropping on a field-by-field level and the CROME polygon vector dataset is one such too. CROME has been used by LCC to identify cropping across the proposed Development Area for the years 2023, 2024 and 2025, in order to estimate the potential of the site, rather than rely on incomplete farmer records, which may not be wholly representative. |

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| Q14.0.14 | **Diversification** – Solar Development Area Does LCC agree with the applicant's view that hosting of the SDA would be a form of diversification for the owners of the agricultural land holdings? | RAC have provided the following response on behalf of LCC.<br><br>In the absence of a comprehensive assessment of the likely impact of the proposed development on affected agricultural land holdings, as advocated by ISEP in its guidance on solar PV on agricultural land **[**SOLAR PV ON AGRICULTURAL LAND**]**, LCC cannot agree that the hosting of the SDA would be a form of diversification for the owners of those holdings.<br><br>Rural diversification is widely supported by planning policy which relies on definitions used by Defra in its statistical analysis of the agricultural sector in England and Wales. The most widely accepted basic definition is "*the entrepreneurial use of farm resources for a non-agricultural purpose for commercial gain*".<br><br>This core, statistical definition includes the letting out of farm buildings and solar generation but specifically **excludes** the letting of land for an agricultural or non-agricultural end-purpose, where the farmer is not actively undertaking the entrepreneurial activity.<br><br>Meeting this condition requires that in order for the proposed solar development to be a diversified activity, the individuals' responsible for each of the individual farms making up the main proposed development area would have to play a functional role in that activity, which can reasonably be assumed to be either financial or managerial. The identities and circumstances of the five landowners affected by the proposed development are not made clear in the ES and there is no associated assessment of the impact of land-take on the agricultural functionality or the continued viability of the affected farming businesses.<br><br>No evidence is produced of the involvement of these principal stakeholders beyond statements at 14.8.39 *et.seq*. of ES Chapter 14 **[**EN010169-000352-6.1 ES Chapter 14 Socio-Economics**]** that landowners within the Solar Development Area will receive an income, which will commence before the proposed scheme becomes active. This is assessed a medium beneficial impact of low magnitude with a consequential minor beneficial effect which is considered to be not significant.<br><br>The Land Rights Tracker **[**EN010169-000570-4.4 Land Rights Tracker (Rev 2)**]** provides details of land interests within the Order limits but does not identify which parties are the principal participants in the scheme or the nature of any agreement that is in place or anticipated to facilitate the scheme.<br>LCC is of the opinion that the lack of evident farmer involvement in the running or financing of the proposed solar enterprise, the effective drawing of a rental income with no associated responsibilities, and the scale of the proposed scheme all lead to the conclusion that the proposed development is not agricultural diversification but a form of temporary land use change by a third party from agriculture to renewable energy generation. |
| Q15.0.1 | **Study Area** The three study areas are illustrated in ES figure 12-1 [APP-111]. These have been altered since the Scoping Report and Preliminary Environmental Information Report (PEIR). Please confirm whether you are satisfied with the proposed approach and identify any concerns you may have. | AAH Consultants have provided the following comments in response to question 15.0.1 on behalf of LCC.<br><br>AAH are generally satisfied with the adopted study areas. However, Figure 12-15 indicates extensive theoretical visibility of the proposed pylons without clearly identifying individual pylon locations at this stage or their respective visibility. Further clarification of the ZTV presentation would be welcomed to better understand the potential landscape and visual effects of the Grid Connection Route. |
| Q15.0.13 | **Proposed planting** ES Appendix 12-3: Landscape Baseline [APP-237] states that the National Character Area 'The Fens' has woodland blocks, isolated field trees and shelterbelts of poplar, willow, leylandii hedges. Paragraph 5.2.8 of the Arboricultural Impact Assessment [APP-242] and [APP-243] states that the most well represented species recorded were ash and hawthorn with sycamore, white | AAH Consultants have provided the following comments in response to question 15.0.13 on behalf of LCC.<br><br>AAH considers the indicative planting mixes in Tables 5-1 and 5-2 to be broadly appropriate. However, the absence of hawthorn, a characteristic and well-represented species within the local landscape, is noted. |

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| | willow, and elder. To the applicant: • Please explain why defective shrubs in section 5.5 would not to be replaced should they also serve a landscape screening function • Please explain the rationale behind the species mix in table 5-1 • Paragraph 5.4.7 bullet point 4 of the OLEMP [REP1-070] says that failed or defective plants would be replaced where they provide a landscape screening function. Please provide an example of where within the proposed development which planting would not be replaced and why. • Bullet point 5 refers to monitoring of hedgerow health and condition. Please explain given this section concerns shrubs and scattered trees why is there no reference to hedgerows? **To LCC** and SHDC: please comment on the proposed indicative planting mix set out in tables 5-1 and 5-2 within the OLEMP [REP1-070] with regard to how they fit within the landscape character area. | AAH recommends its inclusion within the proposed planting mixes to better reflect the existing Fenland landscape character unless further justified by the applicant.<br><br>AAH also considers that planting relied upon for landscape screening should be maintained and replaced where necessary throughout the operational lifetime of the Scheme. |
| Q15.0.14 | **Proposed planting** Paragraph 9.11 of LCC's LIR [REP1-106] recommends more mitigation planting could be integrated into the landscape where it relates to settlements, rivers, watercourse, existing scattered woodland blocks and existing field boundary vegetation alongside the inter-array overhead line. Is LCC able to direct to where they consider this planting should be located. | AAH Consultants have provided the following comments in response to question 15.0.14 on behalf of LCC.<br><br>AAH considers that additional mitigation planting should be focused along the Overground Inter-Array Connection between Land Parcels C and D, particularly where the route passes close to settlements, watercourses and existing field boundaries.<br><br>Planting should reinforce existing hedgerows, scattered trees and woodland blocks where opportunities arise, rather than introducing continuous belts of planting that would be uncharacteristic of the open Fenland landscape.<br><br>AAH recommends that the Applicant identifies these opportunities on the Outline Landscape Masterplan for further consideration. |
| Q15.0.18 | **Photosheets** LCC LIR [REP1-106] Appendix i: Landscape and Visual Review by AAH Consultants. The ExA note comments made in paragraphs 2.9, 3.12 and 5.5 with regard to photosheets (photosheets Part 1 [APP-131] to Part 12 [APP-142] and LCC photosheets Part 1 [APP-143] to Part 4 [APP-146]). The ExA also notes the applicant's response to this particular point at reference 17.4 within Applicant's Comments on Local Impact Report [REP2-015]. **To LCC** and SHDC: Notwithstanding comments already received, are you happy with the number, range and direction of views provided, and with the number and range of photomontages? If not, please indicate the location and direction of other views that you feel are important, and whether these should be type 1 or type 3 visualisations. To the applicant: Please respond to the comments made at paragraphs 3.12 and 5.5 within LCC LIR Appendix i and please confirm whether discussions are taking place on this matter. The ExA note this is not a matter detailed within the draft SoCGs with LCC [REP1-082] or SHDC [REP1-081]. | AAH Consultants have provided the following comments in response to question 15.0.18 on behalf of LCC.<br><br>AAH acknowledges the Applicant's response at reference 17.4 of REP2-015 and considers that the range and distribution of representative viewpoints are generally appropriate.<br><br>However, AAH recommends that the viewpoint location plans and accompanying visualisation files clearly distinguish between Type 1 visualisations, Type 3 photomontages and cumulative viewpoints to improve the accessibility and interpretation of the submitted material.<br><br>AAH considers that additional Type 3 photomontages would be beneficial at selected locations, particularly where cumulative effects may arise and in proximity to substations, ancillary infrastructure and other taller elements of the Scheme.<br><br>AAH also recommends that further detail is provided on the proposed overhead grid connection route, including the indicative pylon locations, to enable consideration of whether additional representative viewpoints or photomontages are required along the route. |
| Q15.0.23 | **Photosheets** – additional winter photograph Please comment on the additional winter photography [REP1-079] provided and whether it affects any of the conclusions previously drawn. | AAH Consultants have provided the following comments in response to question 15.0.23 on behalf of LCC.<br><br>AAH has reviewed the additional winter photography [REP1-079] and welcomes its submission, which provides a more representative indication of potential visibility during periods when deciduous vegetation is not in leaf. |

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| | | AAH previously raised concerns regarding the presentation and interpretation of the photography, including the need to demonstrate whether increased visibility through vegetation would alter the magnitude or significance of visual effects identified within the LVIA.<br><br>The Applicant has acknowledged these concerns and committed to providing further viewpoint-specific clarification within an updated Technical Note.<br><br>Subject to satisfactory review of this additional information, AAH does not currently consider that the winter photography necessitates changes to the conclusions previously drawn. However, confirmation is required that the increased visibility during winter months has been appropriately reflected in the assessment, including the anticipated effectiveness of mitigation planting at Year 15. |
| Q15.0.28 | **Landscape Baseline** ES Appendix 12-3: Landscape Baseline [APP-237] refers to the document Agreed Landscape Character for the East of England region by Landscape East and Landscape Character Types. ES Appendix 12-3 explains this document has not been considered within the LVIA. Please comment on this approach. | AAH Consultants have provided the following comments in response to question 15.0.28 on behalf of LCC.<br><br>AAH considers that the use of more detailed local landscape character assessments as the principal basis for the LVIA is appropriate alongside site-specific landscape character appraisals undertaken as part of the LVIA process. However, the Agreed Landscape Character for the East of England Region provides additional strategic context and should not necessarily be disregarded solely because more detailed assessments are available.<br><br>AAH recommends that the Applicant clarifies the rationale for excluding this study and confirms whether its relevant landscape characteristics are adequately represented within the adopted baseline.<br><br>Subject to this clarification, AAH does not anticipate that consideration of the regional study would materially alter the conclusions of the LVIA. |
| Q16.0.25 | **Construction vibration** ES Chapter 13 [APP-064] paragraph 13.4.10 discusses traffic-induced vibration and its causes. It states that construction and decommissioning traffic vibration is typically scoped out with reference to DMRB LA111. Whilst acknowledging that DMRB LA111 relates to operational traffic vibration, the paragraph goes on to state that the guidance can be applied to general road use where road conditions are assumed to be well maintained (smooth and free from irregularities). On this basis, the applicant concludes that traffic-induced vibration would not lead to significant adverse effects and consequently, that construction and decommissioning traffic vibration did not require further assessment. The ExA notes that construction and decommissioning vibration effects were not scoped out in the Scoping Opinion [APP-167], only operational traffic vibration effects were scoped out. Given the concerns raised within RR ([RR-034], [RR-186], [RR-201], [RR-123], [RR-180]) regarding the condition of sections of the local highway network that would be used by HGVs to access the scheme, the ExA is concerned that the potential for construction and decommissioning traffic vibration effects has been underestimated. Can the applicant therefore explain the basis on which the decision was taken not to assess construction and decommissioning traffic vibration effects, including how the condition of the affected highway network was taken into account in reaching this conclusion. The ExA also invites the local authorities to provide their views on the applicant's approach to scoping out an assessment of the construction and decommissioning traffic vibration effects, | LCC have no comments to make with regard to construction vibration and would defer to South Holland District Councils Environmental Health Officer. |

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| | including whether they consider the approach to be robust and adequately justified. | |
| Q18.0.3 | **Accesses HR-01 and HR-02** To the applicant: the Relevant Representations Report [REP1-074] in response **To LCC**-047 – LCC-050 refers to accesses HR-01 and HR-02 serving separate sections of the GCR which are located within different construction work zones and details of how those accesses would function. Can the applicant: • Provide a plan showing the construction work zones for the GCR as referred to in their response. • Explain how access HR-01 would be constructed so that it can operate predominantly as a left-in/ right-out movement and access HR-02 would be constructed so that it can operate predominantly as a right-in/ left-out movement removing the need for a ghost island right turn arrangement. • What measures would be in place on the A151 to prevent construction traffic crossing over the A151 from access HR-01 to/ from HR-02 particularly given the works that are proposed in this location of stringing pylon 4SV35 and that sheet 2 of 9 of Figure 2-7: Grid Connection Route Illustrative Construction Layout Plan [APP-079] appears to show the construction access crossing over the A151. • Clarify why the surfacing of the internal road with bound surfacing material from the public highway for accesses HR 01 and HR 02, as shown on sheets 1 and 2 respectively within annex B of the Outline Construction Traffic Management Plan (OCTMP) [APP-278], is specified as 25m whereas within the OCTMP is it stated as 20m. **To LCC**: Please comment on the applicant's response with regard to accesses HR 01 and HR 02 within the Relevant Representations Report [REP1-074] in response **To LCC**-047 – LCC-050. | LCC remain concerned that the accesses are opposite and consider that this could lead to potentially unsafe straight over vehicle movements across the A151. LCC suggest that these access points need to be staggered. |
| Q18.0.21 | **Suitability of highway network** NPS EN-3 paragraph 2.10.117 states that all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and widths of vehicles. Please comment on the suitability of the local highway network to accommodate the volumes and types of vehicles proposed to serve the proposed development throughout the OL, with particular regard to highway condition, carriageway width, junction visibility and any associated highway safety or capacity considerations. The ExA note the ongoing discussions detailed within the LCC SoCG [REP1-082] with regard to accesses HR-01 and HR-02. | The volume of traffic proposed and the routings to be used are considered acceptable, except for the points which have been raised in LCC's LIR. As noted, there are ongoing discussion regarding accesses.<br><br>Some minor roads are also proposed and these need mitigation in the form of passing places. The applicant has advised LCC that they are preparing a passing place proposal document to address this.<br><br>The condition of the highway network will be monitored through the before/after survey process proposed in the CTMP. (7.4.2) |
| Q18.0.37 | **Traffic assessment** Please comment on the application of the 'manual adjustment' process for receptors, as outlined in paragraph 15.4.17 of ES Chapter 15: Traffic and Transport [APP-066], and whether the approach has been applied appropriately and consistently. | The process outlined in 15.4.17 removes links with very lows traffic flows (Less than 100 in 1 hour, 600 in 12 hours, 1200 in 24 hours). These links would not be a concern to the highway authority in terms of capacity. With regards to highway safety the Highways Authority has concerns with some links with low flows, these require passing places as identified in our LIR. |
| Q18.0.38 | **Road safety, driver delay, severance, pedestrian delay, fear and intimidation** Please comment on the sensitivity ratings assigned to the receptors identified in tables 15-23, 15-24 and 15-25 of ES Chapter 15: Traffic and Transport [APP-066] and whether these have been assessed appropriately. Are there any receptors for which the assigned sensitivity may not accurately reflect local conditions or likely vulnerability to traffic and transport effects. | The Highways Authority has no comment on these sensitivity ratings. |
| Q18.0.39 | **Road safety assessment for link and junction receptors** To the applicant: Table 15-32 in ES Chapter 15: Traffic and Transport [APP-066]. Please explain how the sensitivity category and initial magnitude category have been established for each receptor and how HGVs have been considered as detailed in paragraph 15.8.55. | The conclusions in paras 15.8.58 – 15.8.61 seem reasonable. |

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| | For example, L21 Barrier Bank at paragraph 15.8.58, whilst this refers to the link having capacity to accommodate the proposed development traffic during the peak periods and not causing increased road safety risk, please explain how HGVs have been assessed in that scenario. **To LCC**: Please comment on the conclusions reached regarding road safety and HGVs within table 15-32 and paragraphs 15.8.58 – 15.8.61 of ES Chapter 15: Traffic and Transport [APP-066]. | |
| Q18.0.44 | **Outline Construction Traffic Management Plan** To the applicant: Annex C of the OCTMP [APP-278] presents the swept path analysis location plan for AILs, with blue circles identifying access locations. Please clarify why these access markers appear to be provided at highway junctions and do not demonstrate the swept paths associated with site access points from the public highway into the OL. **To LCC**: Please comment on whether the level of detail provided within annex C is sufficient to demonstrate that AILs can safely access the OL and whether any further swept path analysis should be provided. | The drawings show indicative swept paths for possible AILs. However, AILs will require separate permissions. |
| Q18.0.48 | **Cumulative impact** To the applicant: Please clarify: • Whether the traffic flows presented in tables 15-36 and 15-37 of ES Chapter 15: Traffic and Transport [APP-066] include traffic associated with the proposed development. • What the percentage increases are relative to. • Paragraph 15.11.18 of ES Chapter 15: Traffic and Transport [APP-066] states that, where a minor impact has been identified, a further assessment incorporating Scheme traffic has been undertaken. Please explain why this additional assessment has not been conducted for all identified receptors. **To LCC**: Please comment on the traffic flow data and percentage change presented in tables 15-36 and 15-37 of ES Chapter 15: Traffic and Transport [APP-066], including whether there are any specific highway links or junctions that give rise to concern. | The Highway Authority has reviewed the data in tables 15-36 and 15-37. The data in Table 15-36 for all vehicle traffic flows shows low percentage increases. These are within daily/seasonal variations and are not likely to cause capacity concerns.<br>Table 15-37 shows HGV percentage increases, many of the links will experience changes of HGV flows of around 25%. This will be noticeable but is not likely to cause capacity issues or unacceptable impact on road safety. |
| Q19.0.17 | **Outline Flood Emergency Response Plan** The applicant has submitted an Outline Flood Emergency Response Plan (OFERP) [REP2-005] in response to a request by the ExA. Please provide your comments on this document, referencing current policy and guidance. In providing comments, please consider the following: • Are you satisfied that sufficient information has been provided to meet the requirements of NPS EN-1 (including paragraphs 5.8.11, 5.8.15, 5.8.29, 5.8.33, 5.8.36.)? If not, please confirm what you consider to be missing. • Please confirm if the flood depths and speed-of-onset calculations are appropriate and represent a reasonable worst-case scenario, given the flexibility in the parameters. In responding, please include comment on the fact that onset times cannot be quantified for the South Holland Main Drain Catchment as the model is only 1D. • Is the use of 'average flood depth' in m Above Ordnance Datum (AOD) an appropriate way to describe a reasonable worst-case depth? • Is the risk of fluvial flooding from a breach in the River Welland flood defences negligible during the construction period, given the commitment to maintain the flood defences? If not, why not? • Are you content that the risk from tidal flooding is captured within the flood extents for the River Welland 1 in 1000 year +28% climate change breach modelling? • Are you satisfied that the evacuation points shown in appendix A are sufficient and accessible in the time available? • Paragraph 3.1.10 states that the site manager would be responsible for monitoring Met Office forecasts and flood warnings and assessing site conditions to determine whether staff should be evacuated to the designated evacuation point or directed to the designated | Due to time constraints, LCC is not yet in a position to provide a comprehensive response to this question, as it will need to be reviewed by colleagues in the Emergency Planning team.<br><br>LCC will seek to provide a substantive response to this question by DL4 or sooner if possible. |

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| | construction compounds, as appropriate. Do you consider this to be workable and sufficient? • The applicant states that 'During times of heavy rainfall, there will be a reduced number of staff working on site and it is expected that staff would not be carrying out visits on site during times of heavy rainfall'. In paragraph 3.2.6 [REP2-005] it is stated that 'During periods of forecast heavy rainfall, working on site will be restricted and visitors are unlikely to be on site'. It is also stated that 'a record of staff and visitors on site will be maintained at all times to ensure all individuals can be accounted for during an evacuation or refuge event'. Are you satisfied that this is precise, enforceable and sufficiently mitigates the risk? • Is it appropriate that the emergency response plan relies on the 1% annual exceedance probability (AEP) + 28% or 13% climate change for the Postland Pumped Catchment and the South Holland Main Drain Catchment respectively? • The refuges at parcels A, B and C would be protected by a flood protection wall and gate to a height of 2.6 mAOD, 2.5 mAOD and 2.4 mAOD respectively. Are you satisfied that such a measure can be relied upon over a period of 40 years? • It is proposed that emergency supplies will be stored within the refuge cabins for stays up to 48 hours, to be checked every 6 months. Given that the time for waters to recede has not been provided, are you satisfied that this is sufficient? | |
| Q19.0.18 | **Safety of workers in construction compounds** The OCEMP [REP1-061] states that 'Where reasonably practicable, temporary construction compounds will be located outside of areas of fluvial Flood Zones 2 and 3'. Construction compounds may contain welfare facilities and refuge from flooding. The applicant states that it is anticipated that some compounds may need to be located in Flood Zones 2 and 3, associated with a breach scenario for the River Welland, and Flood Zone 3b of the South Holland Main Drain Gotts catchment (the inundation time of which is unknown) [REP2-005]. In section 3.1.3 [REP2-005] the applicant suggests that 7 'illustrative' locations would be at risk from a breach of the River Welland flood defences (coinciding with the undefended Flood Zone 2 of the Postland Catchment), two locations in the undefended Gotts catchment, including in the 1 in 30 year % AEP event would be at risk, and two locations associated with the GCR where there is no detailed modelling. In these examples, the applicant proposes that safe refuge is provided in a welfare cabin, either raised on a platform or stacked on top of the ground floor unit.<br><br>Given the predicted speed of onset of flooding from the River Welland ('within 45 minutes' to the centre of parcel A), the Postland Catchment (less than 2 hours to parcel C) and that the speed of onset of the South Holland Main Drain is unknown, are you satisfied that the proposals are adequate to ensure that people will not be exposed to hazardous flooding? • There would be a maximum of 855 construction staff on the site. Allowing for 16 people per cabin, a refuge capacity for 368 personnel would be catered for if all 23 compounds are available. The applicant considers this reasonable because 'during periods of heavy rainfall, reduced staff levels will be maintained on site, and evacuation will have taken place at the Flood Warning stage' (paragraph 3.7.3) [REP2-005] and 'if safe evacuation is not possible for all staff to the safe refuge cabins, personnel must follow the egress route for each Land Parcel' (paragraph 3.7.4). Are you satisfied that this meets current policy and guidance, in particular that people will not be exposed to hazardous flooding? If not, why not? • It is then stated at paragraph 3.7.7 [REP2-005] that 'The evacuation procedure should be developed on site to ensure staff are directed to | As an initial comment, LCC consider that this topic would form an important component of any on-site risk assessments and site mitigation plans.<br><br>Due to time constraints, LCC has not been able to secure a comprehensive response to the specific queries raised on the OCEMP, as the supporting documentation will need to be reviewed in detail by the Emergency Planning team. LCC will therefore seek to provide a substantive response to this question by DL4 or sooner if possible. |

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| | compounds so as not to overload one compound in particular. The site manager should consider zoning works areas to facilitate this'. Are you satisfied that this can be relied upon as a form of mitigation? | |
| Q19.0.22 | **Adoption and maintenance of the drainage system** In the outline Drainage Strategy [APP-227] the applicant states that drainage features would be monitored and maintained according to standard practice and would be regularly inspected and maintained by the contractor and construction personnel. Annex E [APP-232] sets out an 'anticipated' inspection and maintenance schedule for the grid connection route strategy. The OOEMP [REP1-063] states that monitoring requirements will be included in the detailed OEMP. Are you satisfied that these proposals meet the requirements of section 5.8 of NPS EN-1 (including paragraph 5.8.39) and that they are sufficient to ensure that there would be no adverse effects on the water environment? | LCC note that detailed monitoring requirements will be included in the detailed OEMP when submitted. For clarity, direct LLFA involvement for the inspection of water courses and assessment of maintenance of water courses would only be for those designated as 'ordinary watercourses' (not Internal Drainage Board watercourse or those water courses designated as main river by the EA). This work would be managed through the Floods and Water team at LCC. |
| Q20.0.6 | **Materials and waste** The LCC LIR [REP1-106] identifies several concerns regarding the applicant's cumulative assessment of waste and recycling effects. In particular, it suggests that potential inconsistencies within the assessment may affect the estimated magnitude of impact and significance of effect, that the cumulative volume of waste arising from the decommissioning of solar developments in Lincolnshire may have been underestimated, that the assessment is limited to decommissioning, and that effects associated with the potential, future Windsock Solar scheme have not been considered. The applicant has sought to address these concerns in its Comments on Local Impact Reports document [REP2-015] (references 12.1-12.7). Please provide your comments on the applicant's response and explain the basis for any areas of continued disagreement. | With regard to the applicant's Comments on LIRs (REP2-015) on these matters, with references to items 12.1-12.7:<br>• Potential inconsistencies within the assessment (see 12.4) – LCC accepts the explanation that decommissioning, and thus the quantity of waste PV panels, could spread over multiple years, However, this would also mean that the waste panels from other solar NSIPs would be similarly spread, increasing the likelihood of them arising simultaneously.<br>• The cumulative volume of waste arising from the decommissioning of solar developments in Lincolnshire may have been underestimated (see 12.4) – In light of the above, our concerns have been allayed on this matter. However, we remain concerned over the current lack of PV panel recycling capacity and whether sufficient will become available to handle the cumulative quantities.<br>• The assessment is limited to decommissioning (see 12.7) – Whilst the percentage of failures in the construction and operational phases will be relatively small, the large number of panels across multiple projects will produce a significant quantity of waste arisings in need of specialist processing. There is also likely to be a requirement for a full replacement programme during the lifetime of each project producing the same arisings as at decommissioning.<br>• Effects associated with the potential, future Windsock Solar scheme have not been considered (see 12.5) – We accept the additional figures, and they need to be included throughout the project documents.<br><br>Overall, the applicant's calculations provide a reasonable forecast for decommissioning arisings of PV panels but we remain concerned:<br>• That insufficient consideration has been given to the waste arisings from failed PV panels during the construction and operational phases, and<br>• That there is currently a lack of appropriate recycling capacity for processing the anticipated quantity of failed PV panels in line with the Waste Hierarchy. |
| Q20.0.12 | **Major accidents and disasters** Please confirm if the outline Battery Safety Management Plan (OBSMP) [REP2-006] has been reviewed and whether the mitigation measures proposed within it are considered appropriate. If not, please provide an explanation. | To confirm, the following document **7.18 Outline Battery Safety Management Plan (Rev 1) - (Clean) (PDF, 2MB)**, published 7 October 2026, has been reviewed.<br><br>As the summary explains, this OBSMP covers the proposed mitigation measures with the specific details of the project to be later confirmed:<br><br>*"The BESS design and system chemistry type is still to be determined, and the final battery chemistry will be confirmed as part of the detailed design prior to the commencement of construction. This document details* |

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| | | *the types of safety systems available on the market at present, along with risk reduction barriers which are likely to be incorporated into the BESS design selected to be installed"*<br>The document does appear to provide assurances that suitable and sufficient mitigation measures will be incorporated. The Industry Safety Standards referenced in 1.5.2 are those expected, and there are repeated assurances provided throughout the document that the systems ultimately chosen will be those that meet these various standards and test methods.<br>E.g. *"The BESS will be designed, selected, and installed in accordance with international guidance, good practice, and related standards;"*<br><br>The underpinning strategy is based on this being an unstaffed site (apart from when maintenance is necessary), relatively remote from residential property (>350m) and closest Public Rights of Way (>450m), and that a fire scenario will be contained to the *"BESS enclosure or ESS equipment"* involved. This will then support a defence firefighting strategy to be adopted by LFR.<br><br>This rational is sound but, as the document itself explains, relies upon all the safety systems ultimately selected meeting the relevant standards to ensure they would behave in the way anticipated so that the fire is contained:<br><br>*"1.4.3. Final BESS design and site layout at the detailed design stage will have been validated through Large Scale Fire Testing (LSFT) mandated in NFPA 855 (2026) (Ref 3) and rigorous consequence modelling to minimise the requirement for any LFR intervention in a thermal runaway incident. LSFT must validate minimum safe equipment spacing distances to demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. LFR intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with LFR and be clearly communicated in the Emergency Response Plan (ERP)"*<br><br>*"4.5.2. LFR in foreseeable and credible emergency response scenarios, would most likely adopt a defensive firefighting strategy by using water on neighbouring areas such as battery enclosures and structures to cool down and prevent further fire spread. As mandated by NFPA 855 (2026) (Ref 3), the Scheme will select a BESS design that has undertaken LSFT to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and / or can be safely constrained. In accordance with NFCC guidance (Ref 2), the Scheme will be managed in such a way so as to prevent a fire spreading to the BESS inadvertently fire loading, by providing a 'bridge' or path between BESS enclosures to transmit flaming or radiant heat."*<br><br>Section 4 "Firefighting" supports this proposed approach and appears to cover those elements recommended in the NFCC guidance.<br>Note however that the guidance referenced in 4.1.1 "Fire Service Manual Volume 2 Fire Services Operations – Electricity (Ref 35)." is old guidance and no longer used. This guidance is now provided by NFCC under the National Operational Guidance, e.g.: https://nfcc.org.uk/nog/utilities-and-fuel/?id=CM-202242&parent_id=H-19306<br><br>In summary, the mitigation measures proposed with the assurances the document provides that the relevant, recognised industry standards will be met, means they are considered appropriate at this stage. |

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| Q20.0.13 | **Major accidents and disasters** The LCC LIR [REP1-106] indicates that a financial contribution to Lincolnshire Fire and Rescue Service (LFRS), secured through a protective provision, is sought to fund a programme of monitoring, inspection and risk assessment to ensure ongoing compliance with the OBSMP and the Emergency Response Plan. The applicant's Comments on Local Impact Reports document [REP2-015] confirms that the applicant agrees to the proposed protective provisions. To LFRS: Please explain why the requested financial contribution is considered necessary, directly related to the proposed development, and reasonable in scale and kind? In addition, can LFRS clarify how it considers such a contribution could be secured through a protective provision and whether alternative mechanisms for securing any proposed contribution have been considered? To the applicant: Please confirm its position in respect of the requested financial contribution, including whether it considers such a contribution to be necessary and justified, and how it would expect any contribution to be secured/ monitored. To both LFRS and the applicant: Can both parties provide an update on discussions and negotiations relating to the requested financial contribution, including any areas of agreement and disagreement and the progress made towards resolution? | Lincolnshire Fire and Rescue Service (LFR) considers the requested financial contribution necessary to ensure sufficient resources are available to provide appropriate oversight, operational familiarisation and risk assessment throughout the development's lifecycle.<br><br>The contribution will support alignment with national standards and guidance, site familiarisation and emergency response planning, the collection and review of risk information, ongoing engagement with the developer, and monitoring of relevant emergency planning arrangements, including the OBSMP and Emergency Response Plan. The contribution is directly related to the specific risks and operational requirements of the development and is intended to fund additional development-specific activities rather than general fire and rescue service provision.<br><br>LFR has applied its established standard framework for assessing resource requirements and associated financial contributions for this type of development, ensuring a consistent and proportionate approach that reflects the nature, scale and risks of the development. LFR considers that the contribution could be secured through protective provisions within the Development Consent Order, subject to agreement on the detailed arrangements, while remaining open to suitable alternative mechanisms.<br><br>LFR welcomes the applicant's agreement in principle to the proposed protective provisions [REP2-015] and will continue to engage with the applicant to finalise the contribution and appropriate arrangements for securing it. |