Meridian Solar Farm

EN010169

Volume 8

Post-Submission Application Documents

8.39 Applicant's Response to the Examining Authority's First Written Questions (ExQ1)

APFP Regulation 5(2)(q)

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

October 2026

Contents

1. Introduction 3

1.1. Overview 3

2. Applicant's Response to Written Questions 4

2.1. General and Cross-Topic 4
2.2. Design, Parameters and Other Details of the Proposed Development 13
2.3. Grid Connection 30
2.4. Need 42
2.5. Site Selection and Alternatives 43
2.6. Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations 47
2.7. The Draft Development Consent Order 92
2.8. Air Quality 158
2.9. Biodiversity, Ecology and Natural Environment (Environment Impact Assessment Only) 162
2.10. Climate Change 172
2.11. Habitats Regulations Assessment 182
2.12. Historic Environment 195
2.13. Human Health 221
2.14. Land Use and Soils 223
2.15. Landscape and Visual 239
2.16. Noise and Vibration 285
2.17. Socio-Economic Effects 307
2.18. Transportation and Traffic 315
2.19. Water Environment (including Water Framework Directive Assessment and Flood Risk Assessment) 375
2.20. Other Environmental Topics 416

Appendix A: Q3.0.6 Locations of Anglian Water Pipeline assets north of the A151 433

Appendix B: Q6.0.23 Annual Report and Accounts for FY25 for Bagnall Energy Limited (dated September 2025) 434

Appendix C: Q7.3.4 Example Terms of Reference for a Community Liaison Group 435

Appendix D: Q12.0.4 Scheduled Monument Buffer 436

Appendix E: Q14.0.1 Cropping Information Figure 437

Appendix F: Q16.0.1 National Grid Technical Report TR(E)564 (2021) 438

Appendix G: Q19.0.3 Secondary Aquifers 439

Appendix H: Q20.0.10 Alignment of the InterGen NTS to Spalding PS Pipeline 440

Appendix I: ExQ1 Annex A Review 441

1. Introduction

1.1. Overview

1.1.1. This document forms part of an application by Meridian Solar Farm Limited to the Secretary of State under the Planning Act 2008 (the 'Act') for a Development Consent Order (the DCO Application) for the Scheme.

1.1.2. It sets out the Applicant's response to the Examining Authority's (ExA's) first set of written questions (ExQ1).

2. Applicant's Response to Written Questions

2.1. General and Cross-Topic

2.1.1. The below table sets out the Applicant's response to the ExA's written questions relating to general and cross-topic matters.

Table 2.1-1: General and Cross-Topic

ExQ1	Question to:	Question:
Q1.0.1	The Applicant North Levels Internal Drainage Board	**Statement of Common Ground** In the Rule 8 letter [PD-008], the ExA requested a Statement of Common Ground (SoCG) between the applicant and the North Level District Internal Drainage Board. This was not submitted at deadline (DL) 1 and the omission is not referenced in the covering letter [REP1-001]. Please would the parties work together to submit the SoCG by DL3
		The Applicant has engaged with North Levels IDB regarding protective provisions, and has asked whether North Levels IDB would like to enter into a Statement of Common Ground. A response has not been received as of Deadline 3.
Q1.0.2	The applicant	**Common land** Environmental Statement (ES) Chapter 15: Traffic and Access [APP-066] and the Outline Operational Environmental Management Plan (OOEMP) [REP1-063] table 3-12: Traffic and Access detail that maintaining access to the common land adjacent to Martin's Road would be a mitigation/ enhancement measure. Please clarify how providing access to common land, where there is usually a right to roam, is a mitigation or enhancement measure and what 'maintaining access' means in this context.
		The Applicant agrees that the wording could be interpreted as suggesting that the Scheme would enhance access to the Common Land. This is not the Applicant's intention. The Applicant does not

ExQ1	Question to:	Question:
		consider that maintaining access constitutes an enhancement measure, as the Scheme is not creating new access opportunities or improving existing rights of access. The reference to mitigation relates to the manner in which any works adjacent to Martins Road are proposed to be designed and implemented. Without appropriate mitigation, the construction works could result in temporary restrictions to access between Martins Road and the adjoining common land, thereby affecting the public's ability to exercise existing access rights during the construction period. The mitigation measure is therefore the commitment to maintain public access to the common land throughout the construction period, thereby avoiding a temporary adverse effect on existing users of the common land. This would be achieved through the detailed design and construction methodology, including maintaining access points, undertaking works in a phased manner and ensuring that any temporary restrictions are minimised in extent and duration. The reference to maintaining access to the Common Land adjacent to Martin's Road in Table 3-12 of the **OOEMP** (Doc Ref. 7.11 Rev 2) is intended to confirm that existing public access will be retained during the operational phase of the Scheme. It is not intended to suggest that providing access to the Common Land represents a new or additional access right, or that access would otherwise be unavailable to the public. The Applicant acknowledges that the Common Land is understood to facilitate public access. The measure is therefore principally a mitigation and access-management commitment, intended to ensure that the operation of the Scheme does not impede existing use of the Common Land. In this context, 'maintaining access' means that the Common Land will remain accessible to existing users.
Q1.0.3	The applicant	**ES Figure 2-6: Solar Development Area and Inter-Array Connections Illustrative Construction Layout Plan (sheet 3 of 8)**

ExQ1	Question to:	Question:
		Please submit Figure 2-6 [APP-078] with sheet 3 amended to show the construction access that commences at Queens Bank and runs in a northerly manner as shown on Figure 2-7: Grid Connection Route Illustrative Construction Layout Plan [APP-079] and Figure 1: Solar Development Area Land Parcel B5 Construction Compounds within appendix B of the Written Summary of Oral Submissions at Issue Specific Hearing 1 (ISH1), September 2026 [REP1-098].
		ES Figure 2-6: Solar Development Area and Inter-Array Connections Illustrative Construction Layout Plan (Doc Ref. 6.2 Rev 1) has been updated at Deadline 3 to include the construction access.
Q1.0.4	The applicant All interested parties	**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.
		The Applicant has submitted the **Review of the Scheme Against the Revised National Planning Policy Framework 2026** (Doc Ref. 8.41) at Deadline 3. It provides an assessment against the relevant policies of the revised NPPF, and confirms there are no materially different policies that would alter the conclusions within the **Planning Statement** [APP-260].
Q1.0.5	The applicant	**List of cumulative projects** The applicant considered a long list of projects when assessing cumulative effects. Are there any updates or comments regarding any of the applications identified, or have any new applications come to light that are significant enough to require consideration cumulatively with the proposed development?
		The Applicant has updated **ES Appendix 4-1: List of Cumulative Schemes** (Doc Ref. 6.3 Rev 1) for Deadline 3 to review any new applications within the Zone of Influence of the Scheme that have been

ExQ1	Question to:	Question:
		submitted to the relevant consenting authority since the freeze of the cumulative schemes list for the ES (30 September 2025) and to update the status of previously recorded applications. In summary, the only new cumulative scheme short-listed for further consideration is the Windsock Solar Scheme, referenced within the **LCC Local Impact Report** [REP1-106]. This cumulative project comprises a 200MW solar farm approximately 35km from the Order Limits of the Scheme. Whilst it is located outside the Zone of Influence for the majority of EIA assessments, it is located within the administrative area of LCC, and as such, is relevant to the waste and agricultural land use cumulative effects assessment. As explained within **Applicant's Comments on Local Impact Reports** [REP2-015], the inclusion of this cumulative project does not change the cumulative effects assessment conclusion for waste (see Table 3-12, row 12.5) or agricultural land use (see Table 13-1, row 13.1). Furthermore, since the submission of the DCO Application, NGET have launched Stage 2 consultation for the Weston Marsh to East Leicestershire scheme[1]. The Applicant has reviewed the consultation materials published and concludes that these do not alter the findings of the cumulative effects assessment within the ES.
Q1.0.6	The applicant	**Decommissioning – general** The ExA notes that the proposed development would have an operational lifetime of 40 years, commencing from the date of final commissioning, as detailed in requirement (R) 21(2) of the draft Development Consent Order (dDCO) [REP1-006]. Please explain why the operational lifetime is proposed to commence from the date of final commissioning, rather than the date of commissioning of the first phase of the proposed development?

[1] NGET (2026) Stage 2 Consultation for Weston Marsh to East Leicestershire. Available at: https://www.nationalgrid.com/the-great-grid-upgrade/weston-marsh-to-east-leicestershire [Accessed 20/10/2026]

ExQ1	Question to:	Question:
		Please also confirm: • The anticipated period of time between the first and final commissioning phases and the maximum period over which commissioning could take place. • Whether this could mean that elements of the proposed development could be operating for substantially longer than 40 years? If so, how has this been addressed in the ES? Whether the applicant has considered the approach adopted in the Longfield Solar Farm Order 2023, where the 40-year period starts from the full commissioning of the first phase of generating works? Please justify why a different approach is considered appropriate in this instance
		The Applicant's approach to calculating the operational lifetime of the Scheme from the date of final commissioning is well-precedented in, for example, the Green Hill Solar Farm Order 2026 (Requirement 21(1)), the Fenwick Solar Farm Order 2026 (Requirement 19(2)) and the Cottam Solar Project Order 2024 (Requirement 21(1)). The Applicant notes that the Longfield Solar Farm project can be distinguished from the approach taken in respect of the Scheme, on the basis that the Longfield Solar Farm Order 2023 contains a requirement (Requirement 3) for submission of a phasing scheme prior to commencement, and the decommissioning requirement (Requirement 21) has therefore been drafted to align with that phasing scheme. In the case of the Scheme, there is no intention for it to be delivered on a phased basis, with no phases identified within the Application documents and no requirement within the draft DCO for a phasing scheme to be submitted. Rather, the Applicant's intention is for construction activities to take place across all parts of the Solar Development Area concurrently. In this context, it is the Applicant's expectation that any time difference between different parts of the Scheme becoming operational, should this occur, would be at most a matter of months, and therefore most likely to occur within the same calendar year. This differs

ExQ1	Question to:	Question:
		to Longfield Solar Farm, which was allowing provision for a longer duration between commencement and completion of the construction phase.
Q1.0.7	The applicant	**Seasonal output variations** Please explain the anticipated seasonal variation in electricity generation from the proposed solar panels between the summer and winter months. Quantify the variation where possible and confirm how this has been accounted for in the predicted output for the proposed development.
		The Applicant has conducted detailed Energy Yield Analysis to demonstrate the operational behaviour of the Scheme. As with all solar projects in the UK, there is a seasonal peak in the summer months and a daily peak in the middle of the day representative of the sun's movements throughout the day and year. In the early and late months of the year there is a natural winter decrease in production. It is estimated that the summer months (May – Aug) would be responsible for around 50% of the Scheme's annual generation and that the winter months (Dec-Feb) would be responsible for around 10% of the Scheme's annual generation. The remaining 40% of the Scheme's annual generation would be attributed to Spring and Autumn months. The Applicant has designed the Site in terms of proposed tilt and interrow spacing to maximise the annual yield output of the Site.
Q1.0.8	The applicant	**Planning performance agreement** Is the applicant proposing to enter into Planning Performance Agreements (PPA) with Lincolnshire County Council (LCC) and South Holland District Council (SHDC)? If so, please provide high level details of the scope and timing of such agreements and confirm the current status of discussions with each authority. If not, please explain why PPAs are not considered necessary.
		The Applicant has entered into Planning Performance Agreements with both Lincolnshire County Council and South Holland District Council for the pre-examination and examination stages. PPAs were

ExQ1	Question to:	Question:
		also in place with both Lincolnshire County Council and South Holland District Council during the pre-application stage. The Applicant and Lincolnshire County Council commenced discussion on the scope of the PPA to cover the pre-examination and examination stages in February 2026. It was formally signed by both parties in August 2026. Its scope includes technical costs incurred by the Council in relation to pre-examination and post-submission activities, including its relevant representation, Local Impact Report, Statement of Common Ground, specialist input, and attendance at hearings. The Applicant and South Holland District Council commenced discussions on the scope of the PPA to cover the pre-examination and examination stages in May 2026. It was formally signed by both parties in August 2026. Its scope includes reimbursement of the Council for the undertaking of activities in order to support the efficient and effective discharge of the Council's functions during the pre-examination and examination stages. The Applicant continues to engage with both parties on matters pertaining to the DCO Application, with a written record and status of negotiations captured within the respective Statements of Common Ground (Doc Ref 8.10 Rev 1 and 8.11 Rev 1).
Q1.0.9	The applicant	**Battery energy storage system (BESS)** Paragraph 2.6.16 of ES Chapter 2: The Scheme [AS-017] refers to "...a 350MW BESS system with a discharge time of 2 hours, which leads to an energy capacity of up to 700MW." Given that the export capacity of the proposed development is understood to be 750 megawatts (MW), please confirm whether the stated energy storage capacity of 700MW should read 700 megawatt-hour (MWh)?

ExQ1	Question to:	Question:
		That is correct, it should read as 700MWh as total storage capacity and 350MW of power. **ES Chapter 2: The Scheme** (Doc Ref. 6.1 Rev 2) has been updated to correct this change and is submitted at Deadline 3.
Q1.0.10	The applicant	**Overplanting and justification for land take** Please include the proposed overplanting ratio for the proposed solar arrays, to be expressed as the ratio between the maximum installed generating capacity and any future grid export capacity. Also provide a justification for the proposed ratio, to include: • The extent to which overplanting is necessary to consider panel degradation, maximise energy generation and optimise any future grid connection. • Quantify the additional land area required to accommodate any overplanting, expressed in both hectares (ha) and as a percentage of the total solar array area. Explain how the proposed level of overplanting and associated land take are an efficient use of land having regard to the relevant provisions of National Policy Statement for Renewable Energy Infrastructure (NPS EN-3).
		The modules will not generate at their rated D.C. output for most of the year. Rated output is measured under standard test conditions (1,000 W/m² irradiance at a cell temperature of 25°C), which are rarely met in practice. Lower irradiance, cloud cover, higher cell temperatures and electrical losses between the modules and the connection point all reduce output. As a result, 750MWp of modules would deliver well below 750MW to the grid for almost all of the year, and the connection would be significantly under-utilised. Modules also lose output gradually over their operational life. Output falls by about 1% in the first year and about 0.4% each year thereafter, so that by year 40 the modules will produce about 80-83% of their original output.

ExQ1	Question to:	Question:
		To make best use of the grid connection, the Applicant proposes to install more D.C. module capacity than A.C. inverter capacity. This is known as overplanting. The current design provides for approximately 810MWp of modules feeding 750MWa.c. of inverters, a ratio of approximately 1.08:1. At this ratio the grid connection would be under-used, because the modules would only reach 750MW for a small part of the year, and less often as they degrade over the life of the Scheme. The extent of the arrays has been sized on this design, as the most appropriate layout in relation to the impacts reported in the Environmental Statement and in feedback received from stakeholders. However, the Applicant notes that module power ratings are increasing each year, and the Applicant will use the modules available at the time of detailed design. This is likely to increase the installed capacity within the same array area to a maximum of approximately 1,050MWp, a ratio of 1.4:1 at the most, which would make fuller use of the connection over a greater length of time. Overplanting does not increase the power that can be exported at any one time, which remains limited to 750MWa.c. by the inverters and the grid connection. The maximum ratio of 1.4:1 has been set by energy yield modelling, as the point beyond which additional modules would add little useful generation.

2.2. Design, Parameters and Other Details of the Proposed Development

2.2.1. The below table sets out the Applicant's response to the ExA's written questions relating to design parameters and other details of the Proposed Development.

Table 2.2-1: Design, Parameters and Other Details of the Proposed Development

ExQ1	Question to:	Question:
Q2.0.1	The Applicant	**Pylons** Can the applicant please confirm where the cable drums delivering the conductor wires to the pulling positions for the pylons would be located in relation to each angle tower pylon as shown on Figure 2-7: Grid Connection Route Illustrative Construction Layout Plan [APP-079] and please confirm the size of vehicle that is expected to deliver the cable drums.
		There is no fixed location for where the conductor cable drums would be located relative to each angle pylon. Their precise position would depend on site-specific construction requirements and the length and direction of the stringing activity. However, conductor cable drums would be located within the 'Stringing Positions' which are the orange hatched areas shown on **ES Figure 2-7: Grid Connection Route Illustrative Construction Layout Plan** (Doc Ref. 6.2 Rev 1). Accordingly, the drums would be positioned within these temporary working areas rather than at any prescribed distance or orientation from the angle tower pylon itself. Conductor cable drums would typically be delivered on a low-loader which is classified as a Heavy Goods Vehicle (HGV)/ Depending on the length of the stringing section and the size of the conductor drums required, they may also be delivered by Abnormal Indivisible Loads (AILs). This is set out in **Outline Construction Traffic Management Plan - Part 1** [APP-278], **Annex A.**
Q2.0.2	The Applicant	**Construction compounds**

ExQ1	Question to:	Question:
		Figure 2.8: Indicative and Illustrative Layout Plans and Sections – Section B Grid Connection [APP-019] contains an illustrative construction compound at sheet 5. Please provide: • An illustrative figure of construction compound layout for the variety of construction compounds across the solar development area • An illustrative figure for the compound layout for Work Nos. 3A and 3B • An illustrative figure for the solar station layout including where there would be flood protection in the form of plinths, bund or flood protection wall • Illustrative figures for the hardstanding and parking areas, site and welfare offices and areas to store materials and equipment that would be located outside of the construction compounds or compounds associated with Work Nos. 3A and 3B but detailed within Work No.5 for the solar development area and Grid Connection Route (GCR) • Confirmation of what the maximum height of 20m, detailed within the Design Parameters document [REP1-055], is ascribed to. For example, is this for a structure or a building (or stacked cabins) within any construction compound or compound associated with Work Nos. 3A and 3B? • Confirmation of the maximum height of welfare offices and cabins within the compounds (stacked or unstacked) and place this detail in the Design Parameters document • Confirm where items listed within Work No.5(k) would be sited within the Order limits (OL) and how this would be controlled.
		The construction compounds within the Solar Development Area, including Work No 3A and 3B, would be of a broadly similar layout to the illustration in **Figure 2.8: Indicative and Illustrative Layout Plans and Sections – Section B Grid Connection** (Doc Ref. 2.8 Rev 1). As such, The Applicant therefore does not consider that producing a separate illustrative layout for each type of construction compound would provide materially additional information.

ExQ1	Question to:	Question:
		An illustrative figure of the solar station is shown in **Figure 2.8: Indicative and Illustrative Layout Plans and Sections – Section A Solar Development Area** [APP-018]. Whether it was benefiting from a plinth, flood wall or bund, the form of the solar station itself would remain the same. Beyond the construction compounds, hardstanding would be required for the indicative bellmouths, operational access routes and operational infrastructure. Within the Solar Development Area, this would include accesses and access tracks, On-Site Substation and BESS Compounds and solar stations. Within the Grid Connection Route, this would include pylon working areas, construction access routes, cable sealing end compounds (CSECs) and the operational CSEC accesses. These proposed areas are shown on **ES Figure 2-6: Solar Development Area and Inter-Array Connections Illustrative Construction Layout Plan** (Doc Ref. 6.2 Rev 1) and **ES Figure 2.7: Grid Connection Route Illustrative Construction Layout Plan** (Doc Ref. 6.2 Rev 1). There may be a need for parking and additional welfare facilities, such as portaloos and welfare vans, at working areas. Materials and equipment can be stored outside of the hardstanding areas within the Order Limits, however, they would be subject to any restrictions detailed within the **OCEMP** (Doc Ref. 7.10 Rev 3) (e.g., stand-off distances to a watercourse). The maximum height of 20m detailed within the **Design Parameters Document** (Doc Ref. 7.4 Rev 3) relates to permanent operational infrastructure and is ascribed to the lightning arrestors within the 400kV Substation and 132kV Substations, represented by Work Nos. 3A and 3B, as shown on the **Works Plans - Section A Solar Development Area** [APP-009]. With regards to construction compounds, the maximum height of the temporary construction compounds is not fixed within the **Design Parameters Document** (Doc Ref. 7.4 Rev 3), as this document covers permanent operational infrastructure only. The height of typical modular welfare cabin used during construction are approximately 2.5m high, with larger units up to approximately 3.5m in height. Where cabins are stacked, overall heights would typically range between 5m and 7m depending on the

ExQ1	Question to:	Question:
		module. The Applicant does not propose a maximum height parameter for temporary welfare cabins. Such structures would be temporary in nature and their precise configuration would be determined by the construction contractor. These construction facilities are temporary and reversible, and the conclusions set out within **ES Chapter 12: Landscape and Visual Impact** (Doc Ref. 6.1 Rev 1) would not materially change whether welfare cabins are single or double stacked. The items listed within Work No.5(k) may only be located within the limits of Work No. 5 shown on the **Works Plans** [APP-009 and APP-010]. Construction and decommissioning compounds, including site and welfare offices and areas to store materials and equipment, would be managed in accordance with the **OCEMP** (Doc Ref. 7.10 Rev 3) which is secured through requirement 12 of the **Draft DCO** (Doc Ref. 3.1 Rev 3).
Q2.0.3	The applicant	**Pylons** The Design Parameters document [REP1-055] states that there would be a minimum vertical clearance of 8.1 metres (m) above open ground from the overhead electric line. The Written Summary of Oral Submissions at ISH1 [REP1-098] states that the applicant has designed the scheme using an 8.5m clearance to provide a degree of flexibility and to accommodate constraints that may arise once more detailed survey and LiDAR information becomes available at the detailed design stage. Can the applicant explain why a minimum vertical clearance of 8.5m has not been adopted within the Design Parameters document [REP1-055] if the scheme has been designed to these parameters? The applicant is asked to review whether any other reasonable alternatives in respect of minimum vertical clearance of overhead electric line height for specific sections of the GCR infrastructure have materialised and been considered since production of the ES, after having reviewed the comments from IPs which put forward that greater ground clearance is required.

ExQ1	Question to:	Question:
		The **Design Parameters** (Doc Ref. 7.4 Rev 3) identifies a minimum conductor clearance of 8.1m above open ground, which reflects the minimum clearance requirements derived from the relevant industry standards. The Grid Connection Route has, however, been designed at this stage using a conservative ground clearance value of 8.5m. This additional allowance has been incorporated to provide flexibility pending detailed design and the availability of more accurate survey and LiDAR data. Therefore, whilst the current design has been developed using an 8.5m clearance, the Design Parameters correctly identifies the minimum clearance requirement of 8.1m. The 8.5m figure is not a separate minimum design parameter, but rather a conservative design assumption adopted at this stage. The final detailed design will be confirmed post consent and must accord, at minimum, with the Design Parameters. Since submission of the Application, the Applicant has not identified any further reasonable alternatives in respect to minimum overhead line clearances. The Grid Connection Route has been designed in line with applicable industry standards, and no technical justification has arisen requiring a different minimum clearance approach. The Applicant is currently engaging with South Holland Internal Drainage Board (SHIDB) regarding its request for increased ground clearance at certain locations. The Applicant's position on this matter is set out in **Relevant Representations Report** [REP1-075], **Section 3.13** as well as in the ongoing **Statement of Common Ground with the Water Management Alliance / SHIDB** [REP1-087].
Q2.0.4	South Holland Internal Drainage Board	**Pylons and clearance height** South Holland Internal Drainage Board (SHIDB) has requested a clearance height for the overhead electricity lines of 18m to accommodate the maximum machinery height plus 7m clearance, which the applicant understands is based on Health and Safety Executive GS6 guidance. In the Relevant

ExQ1	Question to:	Question:
		Representations Report [REP1-074], the applicant sets out its approach with reference to the legislation and a hierarchy of standards, which results in a significantly lower clearance requirement. Please respond to this and confirm if the approach is agreed. If not, explain what is required and provide justification for this in the context of legislation, policy and guidance.
Q2.0.5	The applicant	**Cable sealing end compounds** Can the applicant please provide the maximum height parameter of any element that would be present within the cable sealing end compound (CSEC) excluding the terminal pylon (i.e. gantries, cable sealing ends, surge arresters, earthing systems and associated electrical equipment) and please provide the height of the terminal pylon. Please include a maximum CSEC height within the Design Parameters document [REP1-055].
		Excluding the terminal pylons, the tallest structural steelwork within the CSECs would be a maximum height of 15m. This has been included in the **Design Parameters** (Doc Ref 7.4 Rev 3) at Deadline 3. The final heights of the proposed terminal pylons 4SV14 and 4SV17 will not exceed 66m, inclusive of vertical limits of deviation, as set out in the Design Parameters Document.
Q2.0.6	The applicant	**Cable sealing end compounds** Please explain why the Design Parameters document [REP1-055] for CSECs Work No. 10, 12 and 14 do not include horizontal limits of deviation. The ExA note paragraph 2.8.7 of ES Chapter 2 [AS-017] states a 20m limit of deviation has been included within the OL to allow for movement of the CSEC. Please confirm this horizontal limit of deviation aligns with that shown on Figure 2-7: Grid Connection Route Illustrative Construction Layout Plan (sheet 7 of 9) [APP-079].

ExQ1	Question to:	Question:
		The Limit of Deviation (LoD) for the Cable Sealing End Compounds (CSECs) is 20m which is represented by the pink dash line around the CSECs on the **Works Plans - Section B Grid Connection** [APP-010], Sheet 2, and the brown dashed line on **ES Figure 2-7: Grid Connection Route Illustrative Construction Layout Plan** (Doc Ref. 6.2 Rev 1), Sheet 7. The Applicant also refers to its response to Q7.0.4 which addresses similar matters.
Q2.0.7	The applicant	**Cable sealing end compounds** The connection to the National Grid Weston Marsh Substation Note [REP1-094] details that a range of alternative connection arrangements may be required, including overhead lines, underground cabling or a combination of both. The use of underground cabling would necessitate the construction of CSEC within Schedule 1 of the dDCO [REP1-006] at Work No.14. Please explain how the locations of the CSEC within Work No.14 have been chosen to ensure compliance with Rule 3 of the Holford Rules, which advises that, where practicable, CSECs should be sited in inconspicuous locations. Please also identify how the siting of the CSECs would be secured and controlled through the provisions of the dDCO.
		As outlined in **Connection to the National Grid Weston Marsh Substation Note [REP1-094], Section 2.2.2**, the Applicant is not currently able to identify specific locations for any potential CSECs within Work No.14 because there is no fixed or defined alternative connection route. Rather, the flexibility within Work No. 14 is intended to accommodate a range of potential alternative connection arrangements that may be required in response to the evolving design of NGET's G2W and WMEL projects. As the detailed design, alignment, extent and programme of the G2W and WMEL projects are still in the design development phase, the nature of any potential conflict with the Scheme is currently unknown. It

ExQ1	Question to:	Question:
		is therefore not possible at this stage to identify a specific alternative route or the location of any CSECs that may be required. Should an alternative route or technology be required to connect into the proposed NGET Weston Marsh B Substation, the Applicant would have regard to the Holford Rules and Horlock Rules in developing the detailed design. This would include seeking, where practicable, to ensure the route is as direct as possible, minimising sharp changes in direction and thus fewer angle towers. Pylons and CSECs would also be located less prominent locations, maximising stand-off from any residential or sensitive receptors and making use of existing landscape features and natural screening where available. For example, as set out in **ES Chapter 8 Cultural Heritage** (Doc Ref. 6.1 Rev 2), no above ground infrastructure would be located in the field to the east of Wykeham Chapel Scheduled Monument. The **Design Parameters** (Doc Ref. 7.4 Rev 3) have been updated at Deadline 3 to ensure that this commitment is appropriately secured. Furthermore, the **OCEMP** (Doc Ref. 7.10 Rev 3) includes a commitment that no HDD works within the Work No 14 area will be undertaken within 100m of residential receptors, restricting the siting of any CSECs in close proximity to residential properties. In summary, in addition to the Design Principles, and application of the Holford and Horlock Rules, as described within the **Design Approach Document** [APP-268], the final design of the Work No. 14 area is governed by the Requirements of the **Draft DCO** (Doc Ref. 3.1 Rev 3), the **Design Parameters** (Doc Ref. 7.4 Rev 3) and the mitigation secured through the management plans submitted with the DCO Application (refer to **Environmental Mitigation and Commitments Register** [REP1-057] for a full account of the mitigation requirements and how they are secured). Table 2-2 of **Connection to the National Grid Weston Marsh Substation Note** [REP1-094] provides an extract of the mitigation measures relevant to the Work No. 14 area. Access from the public highway to the Work No. 14 area would be in accordance with the **Streets, Rights of Way and Access Plans** [APP-015] regardless of the configuration of the grid connection.

ExQ1	Question to:	Question:
		Accordingly, while the precise location any CSECs cannot be identified at this stage, their siting would be controlled through the **Design Parameters** (Doc Ref. 7.4 Rev 3), which are secured through the Draft DCO, together with the other applicable Requirements and secured mitigation within the management plans. Those controls require the detailed design of Work No. 14 to have regard to the siting considerations above, including the relationship with residential receptors and the restriction of above-ground infrastructure within the field east of Wykeham Chapel Scheduled Monument. Any CSEC would also be required to be located within the limits of Work No. 14 and within the assessed design envelope.
Q2.0.8	The applicant National Grid Electricity Transmission	**Pylons** The applicant has advanced a number of options for the GCR that could occur in Work No. 14 dependent on further discussions with National Grid Electricity Transmission (NGET) as set out in the Connection to the National Grid Weston Marsh Substation Note [REP1-094]. NGET and the applicant: Please provide an update on the ongoing discussions between both parties concerning the alignment and proposed positioning of pylons associated with the Meridian Solar Farm and the Grimsby to Walpole transmission line, with particular reference to the separation distance between the 2 sets of pylons and mitigation measures currently being explored. NGET: Please provide comments on the options advanced within the Connection to the National Grid Weston Marsh Substation Note [REP1-094] for Works No. 14.
		The Applicant has had no further direct engagement with NGET concerning the alignment and positioning of pylons, as NGET maintains its view that it should not engage further on technical matters due to the Scheme's Gate 1 status. In its written representation [REP1-113], NGET sets out its concerns regarding the achievement of appropriate stand-off distances between the proposed Meridian Solar Farm connection infrastructure and the Grimsby to Walpole transmission line. NGET refers to Technical Specification Generic Design

ExQ1	Question to:	Question:
		Principles for Overhead Lines TS2.04 Issue 6 (2021) ("Technical Specification TS2.04") as informing its position on appropriate separation distances. In the **Applicant's Comments on Written Representations** [REP2-014], the Applicant explained that, following its review of TS2.04, it could not identify the basis on which the stand-off distances referred to by NGET had been derived. The Applicant would therefore welcome further clarification from NGET regarding the relevant provisions of Technical Specification TS2.04 and how the separation distances referred to in its written representation have been calculated. Pending further engagement with NGET, the Applicant continues to retain flexibility for Work No. 14 as set out in the **Connection to the National Grid Weston Marsh Substation Note** [REP1-094].
Q2.0.9	The applicant	**Design principles** Section 4.7 of the Overarching National Policy Statement for Energy (NPS EN-1) emphasises the importance of ensuring good design in the development of Nationally Significant Infrastructure Projects, referring also to the 'Design Principles for National Infrastructure developed by the National Infrastructure Commission'. The NPPF also advocates good design. Please set out the approach taken to good design, and how this element of the proposed development has evolved in relation to the following key elements. This should include reference to how each element has responded, in terms of form and siting, to functional and aesthetic requirements, including sensitivity to existing landscape character and nature inclusivity. Reference should be made to how emerging technology can or could be accommodated. Please include details for: • solar panels and associated equipment • on-site substations and associated equipment and structures • BESS • boundary treatments

ExQ1	Question to:	Question:
		• hard and soft landscaping
		Compliance with NPS -EN-1 Section 4.7 'Criteria for good design for Energy Infrastructure' is set out in Appendix B to the **Planning Statement** [APP-262]. The evolution of the Scheme design is described in the **Design Approach Document** [APP-268] Section 6. Good design has been a key consideration from the outset of the Scheme's development. The EIA has informed the iterative design process, guided by design principles developed specifically to address the opportunities and constraints presented by the Scheme. The topography within which the Solar Development Areas are located is predominantly flat and low lying with little fluctuation in topography. The landscape character is recognised by its large, low-lying, flat landscape with drainage ditches, dykes and rivers. The landscape features within the Solar Development Areas Order Limits consist of agricultural fields mainly under arable production, interspersed with individual trees, hedgerows, tree belts (linear), small woodland blocks, and farm access tracks. The landscape character areas reflects this. The siting of the Scheme has avoided statutorily designated landscapes and biodiversity sites. The landscape and ecology strategy and management prescriptions set out within the **OLEMP** (Doc Ref 7.16 Rev 2) have been informed by the conclusions of **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 2). Section 3 of the **OLEMP** (Doc Ref 7.16 Rev 2) describes the existing landscape and biodiversity features, and habitats, which have informed the design of the Scheme. As set out in the **OLEMP** (Doc Ref 7.16 Rev 2) Section 4 overall landscape design principles have been adopted: • careful siting in the landscape (including offsets from properties); • conserving existing vegetation patterns • creating new green infrastructure

ExQ1	Question to:	Question:
		An ecology strategy was also developed (**OLEMP** (Doc Ref 7.16 Rev 2), Section 5) incorporating: • Impact avoidance • a Farmland Bird Mitigation Strategy • Overhead line bird collision risk controls • Trees – minimising the need for the removal of mature trees • Hedgerows - the Scheme has been designed to minimise the loss of, and avoid significant effects on, existing landscape features including hedgerows • Riparian crossings • Animal welfare • Biosecurity • Lighting NPS EN1 recognises in para 4.7.6 '*the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure….* The layout of the solar panels has therefore been informed by landform, landscape character, biodiversity, existing vegetation and engineering considerations such as running the solar panels in straight and parallel lines. From the initial stages of the project the on-site 400kV substation and BESS have been co-located in order to minimise environmental effects and reduce engineering complexity. The siting of the substations and BESS has been guided by the Horlock Rules (as summarised in paragraphs 2.9.18 and 2.9.19 of EN-5) and early stakeholder feedback. Technical and environmental constraints have been considered and balanced in the siting and design of the substations. No internationally or nationally designated sites, ancient woodland, historic hedgerows

ExQ1	Question to:	Question:
		or designated nature conservation areas are impacted by the siting of the substations and flood risk has been a key consideration in the siting and design of the Scheme's substations. The **Design Approach Document** [APP-268] describes in detail how the design and siting of the substations comply with the Horlock Rules and has balanced other environmental and planning constraints. **ES Chapter 3: Alternatives and Design Evolution** [APP-054] provides detail of the alternatives considered when considering the siting of the substations. The approach to boundary treatment, hard and soft landscaping is set out in the **OLEMP** (Doc Ref 7.16 Rev 2).
Q2.0.10	The applicant	**Independent design review** Do you consider that the dDCO [REP1-006] should make a provision for the final design of the proposed development to be subject to an independent design review? If not, why not?
		The Applicant set out its consideration of an independent design review for the submission design in the **Design Approach Document** [APP-268] (see Appendix 1; Developing the Design). The Applicant has not included a requirement for independent design review of the final design in the **Draft DCO** (Doc Ref. 3.1 Rev 3). The Applicant does not consider such a requirement to be necessary or proportionate. The key elements of the Scheme (including the solar arrays, BESS, pylons, substations, cable sealing end compounds and underground cables) are primarily functional infrastructure with little opportunities for architectural input. Design considerations have instead focused on matters such as siting, layout, landscape integration, environmental effects and mitigation, which have informed the evolution of the Scheme throughout the design process. The Applicant considers that the design process undertaken for the Scheme is consistent with NPS EN-1, including paragraphs 4.7.6 to 4.7.8, and that appropriate controls over the final detailed design are

ExQ1	Question to:	Question:
		secured through the certified design documents and the requirement for approval of detailed design by the relevant authorities. The Applicant notes that paragraph 4.7.8 of NPS EN-1 encourages applicants to consider obtaining independent professional design advice, but does not mandate independent design review in every case. In the decision letter for the recent Steeple Solar DCO [EN010163], the Secretary of State concluded that an independent design review process was not necessary, notwithstanding the Examining Authority's recommendation that one be secured through the DCO. At paragraph 4.66, the Secretary of State found that the relevant local planning authority would provide sufficient oversight through the discharge of requirements process and that an independent design panel would not provide design oversight beyond that already secured through the Order. The Applicant also notes that independent design review requirements have not been included within other recently consented NSIP scale solar and electricity transmission DCOs, including Green Hill Solar Farm Order 2026, Fenwick Solar Farm 2026, Tillbridge Solar Order 2025, National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the National Grid (Bramford to Twinstead Reinforcement Order 2024).
Q2.0.11	The applicant	**Design guides** Provide a list of all the relevant national and local design guides that are applicable to the proposed development and/ or are active within the local authority areas. Set out clearly how the design choices made so far, and the design choices in the future, in respect of all above ground elements of the infrastructure would accord with the principles of good design set out in each of these documents.
		The **Design Approach Document** [APP-268] identifies the principal national and local planning policy and guidance relevant to the design of the Scheme. Section 2 of that document sets out the relevant policies on design from the National Policy Statements, the National Planning Policy Framework and

ExQ1	Question to:	Question:
		relevant local planning documents. It also references further documents which provide guidance on design, i.e.: • Planning Inspectorate Advice on Good Design for NSIPs - • Design Principles for National Infrastructure, National Infrastructure Commission (February 2020) • Project Level Design Principles, National Infrastructure Commission (May 2024) In addition, the design of the overhead line and substation infrastructure has been informed by the Holford Rules and Horlock Rules respectively. The Applicant's consideration of these principles is set out in Appendices 2 and 3 of the **Design Approach Document** [APP-268]. The Applicant considers that the Scheme accords with the principles set out in these documents. As explained in the **Design Approach Document** [APP-268], the design process has focused on avoiding and reducing effects through the siting, layout and configuration of infrastructure; responding to landscape character and environmental constraints; integrating landscape mitigation; and taking account of technical, operational and safety requirements. The evolution of the Scheme design and the rationale for key design decisions are described throughout the **Design Approach Document** [APP-268]. The Applicant is not aware of any local authority design guide, SPD or SPG containing design principles specifically applicable to large-scale solar farms, electricity transmission infrastructure or substations within the local authority areas.
Q2.0.12	The applicant	**Replacement of panels** Table 2.5 of ES Chapter 2 [AS-017] details scheme component replacement assumptions. Please confirm: What guarantees are there that the panels will be the same size as those being replaced?

ExQ1	Question to:	Question:
		If there are no guarantees, would this mean that there may be a need for additional piling to be carried out at this time? If the output of the solar farm is restricted to 750MW by a connection agreement, using more efficient or more productive panels would result in waste, would the connection agreement have to be reviewed or revised as part of the operational phase planned maintenance? Alternatively, would there be a reduction in number of panels in order to limit the output?
		The Applicant does not require replacement panels to be the same size as those originally installed and therefore cannot guarantee that identical panels would be available at the time of replacement. However, any replacement panels would need to remain within the design parameters assessed for the Scheme and secured through the DCO. The Applicant does not anticipate that panel replacement would necessitate additional piling. Replacement panels would typically be installed on the existing mounting structures. In the event that replacement infrastructure were required, any works would remain subject to the parameters and controls secured through the DCO. The Scheme has been designed to make efficient use of the available grid connection and includes Battery Energy Storage System (BESS) infrastructure, which provides flexibility in the management of electricity generated by the solar arrays. The Applicant does not anticipate that replacement of panels during the operational life of the Scheme would necessitate amendment of the grid connection agreement. Any future replacement panels would need to operate within the technical and commercial constraints applicable to the Scheme at that time, including the available export capacity.

ExQ1	Question to:	Question:
		The Applicant is not proposing or committing to a future reduction in the number of panels. Any decisions regarding panel replacement during operation would be taken having regard to the technology available at the time, whilst remaining within the limits and parameters of the consented Scheme.
Q2.0.13	The applicant	**Planning Statement** Paragraph 5.2.57 of the Planning Statement (PS) [APP-260] refers to the Electricity Transmission Design Principles. Please confirm whether this document has been published and if so, what weight should the ExA give to the design principles?
		The Electricity Transmission Design Principles (ETDP) were published by NESO in June 2026, following acceptance of the DCO application for examination. The ETDP largely draw together existing design considerations derived from national policy, industry guidance and established professional practice. The Scheme already takes into account those existing design considerations as described within the **Design Approach Document** [APP-268]. EN-5, paragraph 2.9.20 requires that developers have regard to the ETDP in addition to the Holford and Horlock Rules, while paragraph 2.11.2 requires the Secretary of State to have regard to the ETDP when determining applications. Given that the ETDP were published after submission of the application, the Applicant considers that they are a material consideration to which the ExA may have regard. To assist the ExA, the Applicant has prepared **Review of the Scheme Against the Electricity Transmission Design Principles** (Doc Ref. 8.40), which demonstrates how the Scheme aligns with the ETDP.

2.3. Grid Connection

2.3.1. The below table sets out the Applicant's response to the ExA's written questions relating to the grid connection.

Table 2.3-1: Grid Connection

ExQ1	Question to:	Question:
Q.3.0.1	The Applicant	**Gate 1 offer** With reference to the comments made by NGET in its written representation (WR) [REP1-113], please set out the extent to which the applicant has considered appealing the decision to issue a Gate 1 offer in place of a Gate 2 offer. Where such action has not been considered, please provide an explanation.
		The Applicant notes that NESO does not refer to "appeals" in respect of Gate offers and no formal appeal process exists, however, the below summarises the process to raise queries about Gate offers on the basis this is assumed to be what NGET referred to in its comments. Upon receipt of a Gate offer under the NESO Gate 2 to Whole Queue connections process, developers are able to raise queries regarding errors they consider are present in the offer decision directly to NESO. This is done in the first instance through a query raised through the NESO Connections Portal, which must be raised within 4 weeks of the receipt of the offer. This requires the developer to provide evidence of the error alleged. NESO will provide a response within 2-4 weeks, and should this confirm an error, the deadline for signing of an offer will extend by 4-weeks, to enable NESO time to correct the error in the offer. Should the developer consider NESOs response does not fully address the error, a dispute can be raised to the regulator, Ofgem, which will only step in where NESO or the network operator clearly failed to follow the proper process. As outlined above, these queries are a way to correct errors, not a way to win a Gate 2 place. The process is also only available in the period of time immediately subsequent to the receipt of a Gate

		offer. This reflects the general principle that the queue is final and no project can be added or re-entered (including because of a complaint or dispute) until future application rounds. A Gate 1 project's realistic route is therefore to reapply in a future application window and meet the Gate 2 criteria. The Applicant did not identify a formal error in the Gate 1 offer as received, and therefore did not raise a query as to the outcome or details of its offer within the 4 week window as outlined above. The drafting in response to Q.3.0.2 below explains the Applicant's understanding of the basis of its offer, and why it instead considers the appropriate process to obtain a Gate 2 offer is via future application rounds. It is therefore the Applicant's understanding that the formal query process does not present a means by which to obtain a Gate 2 offer. The Applicant notes that outside of the offer process, it has separately submitted a formal complaint to NGET and NESO regarding the position taken by NGET to engagement with the Scheme and in opposition to the DCO application to date. Specifically, this has sought clarity on the relevant NESO direction in respect of any restriction on a Transmission Owner to engage with projects with Gate 1 offers. As outlined by the Applicant's Comments on Written Representations [REP2-014], it does not understand that direction to prohibit any engagement by a Transmission Owner with planning applications for Gate 1 schemes.
Q.3.0.2	The applicant	**Gate 2 readiness** Please confirm the basis on which the applicant is confident that a Gate 2 offer would be secured during the next application window. Additionally, confirm the evidence, assumptions, and assessment criteria that underpin this confidence, including how the proposed development is expected to satisfy the relevant readiness and strategic alignment requirements.
		In a future Gate 2 application window, projects may reapply for Gate 2 status by demonstrating • Progress made since the previous application round against the "readiness criteria" used to order projects within the queue.

		• "Strategic Alignment" with the relevant capacity caps set by NESO for the region in which the project is located. This capacity cap may increase between application windows, in light of new grid network capacity which may have come online (or be planned to come online) for the relevant connection period. The NESO methodology to structure the queue involves its review of the different stages of different projects against the readiness criteria and strategic alignment. <u>Progress against readiness criteria</u> Readiness is measured by the land secured for a scheme, and evidence of a submitted planning application. . Projects that cannot evidence land rights will be placed at the back of the queue, behind projects that do have land secured. Projects that can further demonstrate submission of a planning application will be again placed in front of other projects without planning progressed. This demonstrates NESO's stance of 'first ready, first connected'. In the original application round, while Meridian Solar had land rights secured (by virtue of the voluntary agreements in place for the Solar Development Area) it had not yet submitted its planning application. The submission of this DCO application reflects progress of the Scheme against the readiness criteria, and as such supports the Applicant's confidence in the improvement of its queue position further to a future application, as against projects which only have land rights in place. <u>Strategic alignment with capacity caps</u> In the original Gate 2 application window, the project was not given a Gate 2 offer as it did not meet NESO's Strategic Alignment Criteria. This is because it's position in the grid connection queue did not allow it to fall within the permitted capacity limit for solar capacity in the East of England. NESO's published results state that the cut off point for the permitted capacity limit in this area was reached for offers made prior to September 2021. This predated the Applicant's original offer.

		As such the Applicant relies on future capacity being released within this area in the next application round. NESO have indicated through the publication of the Future Energy Scenarios that the amount of solar power on the network will significantly increase between now and 2050 (above the targets set in the Clean Power 2030 Action Plan). The Applicant's understanding based on engagement with NESO to date is that this includes capacity uplifts within the region of the Scheme. This gives the Applicant confidence that in future Gate 2 application windows that the capacity limits will be increased allowing the Applicant to satisfy Strategic Alignment Criteria and be eligible for a Gate 2 offer. <u>Timing for future Gate 2 application windows</u> As per the Applicant's understanding, NESO intend to run regular future Gate 2 application windows to allow Gate 1 projects or new projects to submit evidence to secure a Gate 2 offer. The Applicant's current understanding is that NESO will wait until the first Gate 2 offer process has finished (advised by NESO per its latest timings as likely to occur in Q1 2027) before providing a firm timeline for the next Gate 2 window. NESO's timeline has experienced significant delay against the original timeline which was outlined at the start of the connections reform. The initial Gate 2 offer process was originally forecast to complete in May 2026, with Gate 2 reapplication rounds to follow. As noted above, this has delayed by at least 6 months. It is therefore it is difficult to have certainty over the exact timing of future Gate 2 application windows. As previously outlined, the Applicant will pursue the earliest opportunity to reapply for a Gate 2 offer.
Q.3.0.3	National Energy System Operator	**Gate result and strategic alignment** Please confirm the basis on which a Gate 1 offer was issued instead of a Gate 2 offer. The NGET WR [REP1-113] states that the BESS and solar components did not satisfy the relevant strategic alignment criteria. If possible, please identify the specific criteria that were not met and explain how this assessment informed the decision to award a Gate 1 offer.

Q.3.0.4	National Energy System Operator	**Gate 2 application** Please provide details of the anticipated timetable for the next Gate 2 application window, including the expected opening date and any relevant milestones.
Q.3.0.5	National Grid Electricity Transmission	**Statement of common ground** At row 3.1.6 of the NGET SoCG [REP1-089], the applicant refers to ongoing design work being undertaken by NGET to further assess the identified pinch point. It is understood that the outcomes of this work have not yet been made available to the applicant. Please confirm whether NGET intends to submit the results of this assessment to the applicant and the examination and, if so, when this information is expected to be provided.
Q.3.0.6	The applicant	**Undergrounding** Should it prove impossible to achieve compliance with NGET's standoff distances, please explain whether the section of the proposed overhead line nearest to NGET pylons 4SV35 and 4SV36, as referenced in the NGET WR [REP1-113], could be undergrounded. Please also explain any technical, environmental, or operational constraints associated with this option. Please also explain why, where sections of the cable route can be undergrounded (for example the range of alternative connection arrangements cited within the connection to the National Grid Weston Marsh Substation Note [REP1-094]), the same approach has not been adopted for other parts of the corridor, particularly in locations where significant adverse landscape character or visual amenity effects have been identified.

		Please also liaise with Anglian Water Services and provide an annotated plan clearly identifying the location and extent of their existing infrastructure at their site to the north of the A151 and adjacent to Work No. 14.
		The final design of the Work No. 14 area is governed by the Requirements of the **Draft DCO** (Doc Ref. 3.1 Rev 3), the **Design Parameters** (Doc Ref. 7.4 Rev 3) and the mitigation secured through the management plans submitted with the DCO Application (refer to **Environmental Mitigation and Commitments Register** [REP1-057] for a full account of the mitigation requirements and how they are secured). Access from the public highway to the Work No. 14 area would be in accordance with the **Streets, Rights of Way and Access Plans** [APP-015] regardless of the configuration of the grid connection. Should undergrounding of the Scheme be required in the locality referenced within NGET WR [REP1-113] (being near 4SV35 and 4SV36, although it is noted for clarity that these are Applicant pylons, not NGET pylons), this would require inclusion of a CSEC north of the A151 within the Work No. 14 area. The **Design Parameters** (Doc Ref. 7.4 Rev 3) established for the underground cabling and CSECs within the rest of the Grid Connection Route are all relevant to the Work No. 14 area, including should it be placed within the area of 4SV35 and 4SV36. A summary of the environmental effects associated with undergrounding the Grid Connection within the Work No. 14 area is provided within **Work No. 14 Assessment Summary** [AS-030]. Further clarification of the design parameters and mitigation requirements for undergrounding the Grid Connection is provided within **Connection to the National Grid Weston Marsh Substation Note** [REP1-094]. In summary, the key technical, environmental and operational constraints associated with undergrounding the Grid Connection in the locality of 4SV35 and 4SV36 include: • Interfaces with NGET's Grimsby to Walpole and Anglian Water Services assets, which will be managed through the bespoke protective provisions included within the **Draft DCO** (Doc Ref. 3.1 Rev 3) for these parties;

		• Construction of watercourse crossings for cabling for which effects will be managed through the measures set out within the **OCEMP** (Doc Ref. 7.10 Rev 3); • Construction noise effects for any trenchless crossings, the effects of which will be managed through the measures set out within the **OCEMP** (Doc Ref. 7.10 Rev 3), including siting any trenchless crossing launch and receive pits a minimum of 100m away from residential receptors; • The area of undergrounding would need to be subject to further pre-construction archaeological evaluation and mitigation (including micrositing where required), as set out within the **OAMMS** (Doc Ref. 8.7 Rev 1); • Pre-construction surveys would also be undertaken for agricultural land classification and protected species to inform design development, micrositing and site-specific management measures in accordance with the **OSMP** (Doc Ref. 7.14 Rev 2) and the **OCEMP** (Doc Ref. 7.10 Rev 3); • As explained within Q.15.0.3 of this document, a CSEC would be sited adjacent to a terminal pylon and therefore would be viewed within the context of the overhead line. Nevertheless, opportunities to minimise the visibility of the CSEC would be considered through micrositing and low level planting (e.g. as specified for the CSECs within the central part of the Grid Connection within the **OLEMP** (Doc Ref. 7.16 Rev 2)); • As set out within the **Design Parameters** (Doc Ref. 7.4 Rev 3), a bund or a flood protection wall and gate would be provided for any CSEC within the Work No 14 area, to a maximum height of 2.3m above ground level, subject to hydraulic flood modelling at detailed design stage. Further to the above, standard good practice measures, as set out within the management plans submitted with the Application, to mitigate effects associated with other environmental topics will be applied to ensure that no significant environmental effects arise.

		Regarding why the Scheme does not propose undergrounding of other sections of the Grid Connection Route (except in the one section where proposed to avoid an existing 132kV overhead line), the starting point for the design approach is the policy position set out in paragraph 2.9.21 of NPS EN-5[2], which states that overhead lines should generally be the strong starting presumption for electricity network infrastructure. This presumption is reversed where proposed developments pass through a National Park, National Landscape or The Broads. There are no such designations within or near the Scheme, with the nearest such designation located approximately 25km to the north-east of the Site. Paragraph 2.9.14 of NPS EN-5 provides that, where there is a high potential for widespread and significant adverse landscape and visual impacts, the Secretary of State must weigh the feasibility, costs and environmental impacts of undergrounding against the adverse effects of an overhead line solution. In response to this, the design has undertaken an iterative comparison of overhead line and underground cable options. As concluded within the **Planning Statement** [APP-260], it is stated that whilst some significant adverse landscape and visual effects arise from the Grid Connection Route and the Overhead Inter-Array Connection, these are not considered to be 'particularly significant' in the context of EN-5, paragraph 2.9.14 to for undergrounding to be justified as an alternative. In conclusion, overhead lines are proposed as the primary connection solution, which is consistent with national policy and the engineering requirements of the Scheme, whilst underground cabling has been adopted in specific locations where site-specific safety, technical or operational constraints justified a departure from that approach.

[2] National Policy Statement for electricity networks infrastructure (EN-5), 2025. Available at: https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5-2025. [Accessed 14/10/26].

		To address the Anglian Water infrastructure location request, the Applicant has produced a plan, provided within **Appendix A** of this document, showing the indicative locations of Anglian Water's existing assets alongside the land take and pylon positions for the Grid Connection Route, north of the A151 and within Work No. 14 area.
Q.3.0.7	The applicant	**Overarching National Policy Statement for Energy EN-1** In light of the issues raised in NGET's WR [REP1-113], please explain whether the applicant still considers that the proposed development would accord with the second sentence of paragraph 4.11.6 of NPS EN-1, which states 'applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible'. Please set out the evidence and reasoning supporting this position.
		The Applicant is not aware of a reason why a network connection in the Weston Marsh vicinity for the project would not be possible. NGET continues to progress network upgrades in this area, through its Grimsby to Walpole and Weston Marsh to East Leicestershire projects. While NGET is not currently engaging with the Applicant or progressing design for the Scheme within the Weston Marsh works on the basis it holds a Gate 1 offer at this stage, it is the Applicant's understanding that engagement would recommence upon award of a Gate 2 offer. The Applicant has outlined at Q.3.0.2 above why it considers a Gate 2 offer could be awarded to Meridian Solar in due course, once NESO opens the next round of Gate 2 applications. However, as outlined in the **Applicant's Comments on Written Representations** [REP2-014], the Applicant does note that: • The targeted consultation materials for Grimsby to Walpole confirmed that both Weston Marsh Substation A and Weston Marsh Substation B are intended to provide capacity for energy projects, including solar projects, in the vicinity.

		• As outlined in the Applicant's **Written Summary of Oral Submissions at ISH1** [REP1-098]) planning application documents submitted by NGET for the Weston Marsh Substation include Meridan Solar in the current needs case for the Weston Marsh Substation A. These indicate that, while NGET is not currently engaging with Meridian Solar to allocate specific capacity for the project, the grid network upgrades which are being progressed by National Grid in the Weston Marsh area are being designed to enable and accommodate new energy projects within the region. Meridian Solar therefore does not see a reason why a network connection in the Weston Marsh area should not be possible, once it has the appropriate Gate offer in place.
Q.3.0.8	The applicant National Grid Electricity Transmission	**Grimsby to Walpole proposed development** NGET: Please confirm when the Grimsby to Walpole application is expected to be submitted and advise what weight the ExA should give the proposal when undertaking the planning balance exercise. The applicant: What weight should the ExA give the proposed Grimsby to Walpole development when undertaking the planning balance exercise?
		The Applicant does not consider that a separate level of weight should be attributed to the proposed Grimsby to Walpole (G2W) project in the planning balance. The relevance of G2W arises principally from its potential interaction with the Scheme, including the potential for cumulative effects, and the physical and operational interface between the two projects. The Scheme is reliant on the G2W project coming forward as it will provide the necessary substation and transmission infrastructure for the Scheme, and the Applicant is not seeking to impede or prevent the delivery of G2W or any other nationally significant infrastructure. The Applicant has had regard to the information available in relation to the proposed G2W project and has considered the potential interactions between the projects. Where interactions arise between the two projects, those interactions should be assessed on their merits and taken into account as part of the overall assessment of the Scheme.

		The Applicant recognises that the interface between the two projects remains subject to ongoing engagement with NGET. The Applicant's position is that the matters identified to date are capable of being managed through the continued development and coordination of the respective projects. The Applicant has set out in the following submissions why it is of the view that these matters can be resolved: • **Connection to the National Grid Weston Marsh Substation Note** [REP1-094], which explains the need for flexibility near the Weston Marsh substation area (Work No. 14) to manage the interaction between the two projects. • **Written Summary of Oral Submissions at ISH1** [REP1-098], which summarises previous engagement between the two parties, including design workshops to manage the design interface. The detailed outputs of those design workshops are subject to an NDA, but the Applicant has developed its design based on the inputs received from NGET in this workshops. • **Applicant's Comments on Written Representations** [REP2-014], which provides a response to the matters raised by NGET in relation to the Connection Agreement, Physical Interfaces and Proximity, Protection of Future NGET Assets, and Compulsory Acquisition Powers. • **Applicant's Comments on Deadline 2 Submissions** (Doc Ref. 8.38), regarding stand off distances and connection to the Weston Marsh B Substation. Further, the Applicant is negotiating protective provisions with NGET which will provide protections for both parties and establish a process for cooperation on the detailed design for the respective schemes. Accordingly, the Applicant does not consider that the proposed G2W project should attract any specific positive or negative weight in the planning balance for the Scheme. However, the Applicant recognises that the ExA will need to have regard to the nature and extent of the

		interaction between the projects, and the degree to which those matters have been satisfactorily addressed, when undertaking the planning balance.
Q.3.0.9	The applicant	**Final investment decision** The ExA notes the applicant's position that it does not intend to proceed to Final Investment Decision (FID) in respect of construction of the proposed grid connection corridor unless it has sufficient certainty regarding the feasibility of the connection. Please provide further detail on this position, including: · What specific matters need to be resolved before the applicant considers sufficient certainty regarding the feasibility of the connection has been established. · The anticipated timing for resolving these matters and how this aligns with the proposed development and FID.
		The two factors which the Applicant considers must be progressed to proceed to FID in respect of the construction of the proposed grid connection corridor are: • Grant of the development consent order, to provide certainty as to the validity of the Scheme to proceed. • Grant of a Gate 2 connection offer, and associated signing of a final connection agreement with NGET, confirming the date and design specifications for the point of connection. Both factors require ongoing progress of this planning application (per responses provided to Q3.0.2 above as to Gate 2 readiness, and for the Applicant to pursue a Gate 2 application. The Applicant is committed to doing so, at the earliest opportunity, as set out in detail in the responses above.

2.4. Need

2.4.1. The below table sets out the Applicant's response to the ExA's written questions relating to need.

Table 2.4-1: Need

ExQ1	Question to:	Question:
Q4.0.1	The applicant	**Statement of Need** The ExA acknowledges that both the Statement of Reasons (SoR) [APP-032] and the PS [APP-260] contain some justification as to the need for the project. Whilst not a statutory requirement, it would be useful for the ExA if the applicant could submit a 'Statement of Need' as a stand-alone document. This document should consolidate relevant points from the SoR and PS, but it should also address, amongst other things, the following points: · UK future electricity requirements and what role would solar farms play, if any, in helping to meet any increases in demand. · Additional detail on the reasons for the scale of the proposed solar farm. · Information on the efficiency and how economically attractive solar generation in the UK is, compared to other forms of renewable generation, would also be helpful.
		The Applicant will draft a **Statement of Need** to respond to the points raised above and submit into the examination at Deadline 4.

2.5. Site Selection and Alternatives

2.5.1. The below table sets out the Applicant's response to the ExA's written questions relating to site selection and alternatives.

Table 2.5-1: Site Selection and Alternatives

ExQ1	Question to:	Question:
Q5.0.1	The applicant	**Flexibility of Order Limits** The dDCO [REP1-006], Works Plans ([APP-009] and [APP-010]) and Land and Crown Plans ([REP1-004] and [REP1-005]) allow for flexibility in cable routing options in a number of locations in the OL. This approach is further explained in section (s) 2.7 of the SoR [APP-032]. • Is the applicant any closer to narrowing down the scope of these options? • Does the applicant anticipate the submission of a change request during the examination in respect of the removal of some optionality from the proposed development?
		The Applicant is not currently in a position to narrow the scope of the optionality identified within the Order Limits. This optionality is considered to remain necessary in light of the ongoing position by NGET to not yet engage on matters of design interaction between its G2W and WMEL projects and the final detailed design and micro-siting of the Scheme. Specifically, pending that further engagement with NGET, the Applicant continues to retain flexibility for Work No. 14 as set out in the **Connection to the National Grid Weston Marsh Substation Note** [REP1-094]. In addition, the location of the Weston Marsh B substation remains subject to ongoing design refinement by NGET as part of the G2W project, the DCO application for which is not due to be submitted until 2027. This requires remaining flexibility by the Applicant for the siting of its OHL infrastructure where it may connect to the final design of the Weston Marsh B substation. On this basis, the Applicant does not anticipate the submission of a change request during the examination in respect of the removal of any optionality from Scheme.

ExQ1	Question to:	Question:
Q5.0.2	National Grid Electricity Transmission	**Tee-in connection** Please confirm why a tee-in connection to the proposed Grimsby to Walpole project overhead line was not considered acceptable.
Q5.0.3	The applicant	**Weston Marsh B substation** The 'Post ISH1 Note: Strategic Site Selection' note [REP1-098] states that between November and December 2025, NGET undertook targeted consultation on its proposals for two new substations at Weston Marsh. This identified indicative locations for two substations, Weston Marsh A and Weston Marsh B. It is further noted that in January 2026, the applicant amended its point of connection (PoC) to a connection into Weston Marsh B and consulted on these changes in January 2026. Explain why Weston Marsh B was the anticipated PoC, rather than Weston Marsh A. Please detail the considerations that informed the selection of Weston Marsh B and why Weston Marsh A was discounted.
		The Applicant notes for clarity in review that the correct reference to its **Post ISH1 Note: Strategic Site Selection** [REP2-017]. Up until mid-2025, the Applicant was unaware of any proposal for more than one substation at Weston Marsh. Engagement with NGET raised the potential for multiple Weston Marsh substations. As noted in the **Applicant's Comments on Written Representations [REP2-014],** while NGET had indicated in late 2025 that its (then current) designs anticipated a connection a Substation A, it was acknowledged by NGET to Meridian Solar that this was subject to the ongoing design of G2W, and may therefore be subject to change.

ExQ1	Question to:	Question:
		Following the launch of the NGET targeted public consultation for both Weston Marsh substation locations in November 2025, the Applicant reviewed the consultation materials to understand both potential locations for the POC and needs case. Both Weston Marsh A and B were identified in the NGET targeted consultation materials as POC's for solar schemes, amongst other drivers. The consultation material also made it clear that the two substations would be linked by NGET infrastructure and form part of the same network. Given the location of Weston Marsh B was to the south of Weston Marsh A, closer to the Solar Development Area, it was concluded that a shorter connection, in a location where there were other projects scheduled to be in the same area (i.e. Grimsby to Walpole, Weston Marsh to East Leicestershire, Outer Dowsing Offshore Wind), would be the most beneficial to both the Applicant and NGET. It would reduce the amount of infrastructure required in the wider area, reducing the potential for conflict, and reducing the cumulative environmental and community effects. The Applicant received no response from NGET at that stage as to why a connection into Weston Marsh B would not be technically feasible, and as outlined above, had received initial indications both directly (via early engagement with NGET) and indirectly (via the scope outlined in the targeted consultation materials) that Weston Marsh B could be suitable to accommodate the Scheme.
Q5.0.4	The applicant	**Area of search** The Post ISH1 Note: Strategic Site Selection note [REP1-098] confirms that a 15-kilometre (km) radius of search was applied. Please explain the basis for the 15km search radius.
		A 15km (straight line distance) was considered by the Applicant the maximum viable distance that could allow a solar Scheme utilising a 400kV overhead line to be economically viable relative the size (in MW) of the grid connection. Assuming a straight-line distance of 15km from the point of connection also allows for the necessary flexibility required through the design, consultation and optimisation of the connection route when accounting for environmental and planning constraints as well routing for the connection being designed to avoid existing/planned buildings and other

ExQ1	Question to:	Question:
		utilities. This flexibility allows for the typical turning and meandering that a connection route often takes which, in turn, increases the 'actual' distance of the connection route beyond 15km, often up to 18-20km. When making an initial investment decision on the development phase of the project, the Applicant considers a straight-line distance from the Point of Connection for the purpose of establishing a reasonable site search area of 15km to sufficiently accommodate the flexibility required. This assumption is driven by the costs of connection infrastructure and the energy yield modelling undertaken to consider the energy output of the site. Energy yield modelling is the analysis that measures the annual output of the Site using local weather data, shading analysis and considering electrical losses. The annual energy generation of the site is a key input in the investment modelling for the Site.

2.6. Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations

Overarching Case

2.6.1. The below table sets out the Applicant's response to the ExA's written questions relating to the overarching case.

Table 2.6-1: Overarching Case

ExQ1	Question to:	Question:
Q6.0.1	The applicant	**Compliance with Ministry of Housing, Communities and Local Government Guidance** Please advise whether the Book of Reference (BoR) [REP1-010] is fully compliant with the Ministry of Housing, Communities and Local Government Guidance 'Planning Act 2008. Guidance related to procedure for the compulsory acquisition of land' (CA Guidance). If not, please amend as necessary.
		The Applicant confirms that the **Book of Reference** (Doc Ref. 4.3 Rev 3) is fully compliant with the DCLG Guidance.
Q6.0.2	The applicant	**Diligent enquiry into land interests** Do you envisage any changes to the application which might engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations)?
		The Applicant has undertaken diligent inquiry for land within the Order Limits, and will continue to monitor and refresh HM Land Registry data throughout Examination to identify any changes in land ownership, occupation or interest in land. This will also be accompanied by desk-based searches. The Applicant also remains engaged with Affected Parties to enter into voluntary agreements and will capture any landownership changes that form part of these discussions. Further hearing notices will be placed on Site to help publicise the scheme and encourage any new person(s) with an interest land to reach out (albeit the Applicant does not anticipate that any such parties would not have been identified by the diligent inquiry already undertaken to date).

ExQ1	Question to:	Question:
		Otherwise, the Applicant would only anticipate the CA Regulations being engaged in the event of a change request that sought to either expand the Order Limits for the Scheme, or increase the level of compulsory acquisition powers already sought. The Applicant does not currently have any intention to submit such a change request, and notes that the only matter it is aware of that could necessitate a change request would be if changes were required to the Grid Connection Route in order to address concerns raised by NGET. However, the Applicant notes that NGET have indicated that they are not currently willing or able to engage on technical matters in respect of the Scheme, meaning it is currently unlikely that any such changes would be agreed with NGET. The Applicant has retained optionality within the Scheme to instead accommodate such design changes post-consent, should these be necessary. The Applicant is however continuing to seek to engage with NGET with a view to resolving its concerns at the earliest opportunity.
Q6.0.3	The applicant	**Reasonable alternatives to compulsory acquisition** In the light of the Compulsory Acquisition (CA) Guidance, in particular paragraph 8: How can the ExA be assured that all reasonable alternatives to CA, including modifications to the scheme, have been explored? • Set out in summary form, with document references where appropriate, what assessment/ comparison has been made of the alternatives to the proposed acquisition of land or interests in each case.
		The Applicant has had regard to paragraph 8 of the Compulsory Acquisition Guidance and to section 122 of the Planning Act 2008. This response summarises the alternatives to compulsory acquisition (CA) that the Applicant has explored, including modifications to the Scheme, and identifies where each is documented.

ExQ1	Question to:	Question:
		The Applicant has explored alternatives at four levels: (a) alternative sites, routes and scheme configurations; (b) design modifications to reduce land take; (c) acquisition by voluntary agreement and (d) ensuring, where compulsory acquisition is sought, that the nature of the interest sought is minimised where possible. Site selection and routing alternatives The alternatives considered in respect of the site selection are set out in **ES Chapter 3: Alternatives and Design Evolution** [APP-054] and **Appendix D: Site Selection Report** of the **Planning Statement** [APP-264] which provides an overview of the site selection process undertaken by the Applicant. As noted in those documents, one example of the Applicant's attempt to minimise land requirements was its request to NGET to consider approving a 'tee-in' connection to the planned Grimsby to Walpole scheme. This scheme comprises a new high voltage transmission line which passes close to Land Parcel D of the Solar Development Area. A tee-in would avoid the requirement for a connection directly into the planned Weston Marsh substation, thus substantially reducing the length of the overhead line required. NGET advised that it would not provide for a tee-in connection and on this basis, only a connection into the future Weston Marsh Substation was considered deliverable for the grid connection. Design modifications to reduce land take The Order Limits have been refined through consultation and design development, as recorded in the **Consultation Report** [APP-037] and the **Design Approach Document** [APP-268]. Although these changes were not driven by compulsory acquisition alone, they have reduced the Order Limits between Statutory Consultation and application submission, and therefore the land to which any compulsory acquisition powers may apply. Where the Scheme could still be delivered without the land concerned, that land was removed from the Order Limits.

ExQ1	Question to:	Question:
		Voluntary acquisition The Applicant has sought to acquire land and rights by voluntary agreement from the outset of the scheme and will continue to do so in parallel with the Examination. Compulsory acquisition powers are sought as a safeguard for plots where agreement is not concluded, because the Scheme cannot be delivered without certainty over the land and rights within the Order Limits. Minimisation of rights sought As explained at section 4.3 of the **Statement of Reasons** [APP-032], the draft DCO secures five categories of land powers. Four of these are powers of compulsory acquisition of interests and the fifth is a power to occupy land temporarily. For each plot, a 'principal' right is sought (as described in, for example, the **Book of Reference** (Doc Ref. 4.3 Rev 3)) – however, in each case powers, are also sought for the use of the subordinate rights to that principal right. For example, where a plot refers to Class 1 (all interests in rights and land), powers to obtain all other classes of rights are also sought for that plot. This approach has been taken in order to allow the undertaker to minimise the rights sought – i.e. to seek less extensive rights or interests where appropriate (such as the use of temporary possession powers for construction, or the use of easements or restrictive covenants instead of full acquisition of land), and therefore to reduce the land take and interference with private rights to the minimum required to deliver the Scheme. For these reasons and given the alternatives and the lesser interests described above, the Applicant considers that all reasonable alternatives to compulsory acquisition have been explored and that the powers sought are proportionate and no more than necessary.
Q6.0.4	The applicant	**Reasonable alternatives to Compulsory Acquisition** Paragraph 25 of the CA Guidance states that applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only

ExQ1	Question to:	Question:
		be sought as part of an order granting development consent if attempts to acquire by agreement fail. Please demonstrate the applicant's compliance with this aspect of the CA Guidance. • Has the applicant offered full access to alternative dispute resolution techniques for those with concerns about the CA of their land or considered other means of involving those affected?
		The Applicant has sought to obtain voluntary agreement as an alternative to Compulsory Acquisition. The Applicant has entered into Option Agreements with the relevant landowners for the large majority of the Solar Development Area (comprising approximately 99% of the land area) – the majority of Land Parcels A and D and all of Land Parcels B and C. This is set out in detail in the updated summary of negotiations provided within the **Land Rights Tracker** (Doc Ref. 4.4 Rev 3). It is noted that for the large majority of the land within the Grid Connection Route, only compulsory acquisition of rights are sought. The Applicant is also seeking to agree the lease of remaining land, rights and interests within the Grid Connection Route by voluntary agreement; and these discussions remain ongoing in respect of the land and new rights required for the Scheme. As part of the continuing negotiations Alternative Dispute Resolution (ADR) pathways will be available to all affected parties with concerns about the valuation or compensation assessments which result as a consequence of compulsory acquisition of their land in line with CA Guidance and the Compensation Code. ADR provisions will also be part of the easement terms which will be included in the voluntary negotiations with respect to any dispuates arising out of any compensation claims that cannot be agreed mutually between the parties with reference able to be made to the relevant professional bodies, such as the CAAV and RICS.

ExQ1	Question to:	Question:
		The Applicant continues to seek compulsory acquisition powers in parallel to the voluntary negotiations in order to have the ability to secure such land, rights and interests and to ensure that any third-party interests or encumbrances affecting such land, rights and interests may be acquired, overridden or extinguished pursuant to the draft DCO. This is to ensure that the Scheme can be constructed, operated and maintained, should voluntary agreement not be possible.
Q6.0.5	The applicant	**Accuracy of the Book of Reference, Land Plans and points of clarification** What assurance and evidence can the applicant provide of the accuracy of the land interests identified as submitted? Please indicate whether there are likely to be any changes to the land interests, including the identification of further owners/ interests or monitoring and update of changes in interests.
		The Applicant has undertaken diligent inquiry for land within the Order Limits (as set out in Q6.0.2) and will continue to undertake desk-based searches, monitor and refresh HM Land Registry data through Examination, as well as ongoing landowner engagement to identify any changes in land ownership, occupation or interest in Land. As a result of this approach, the Applicant has provided an updated **Book of Reference** (Doc Ref. 4.3 Rev 3) at Deadline 3 which captures the latest changes in land ownership, occupation or land interest. Further hearing notices will be placed on Site to help publicise the Scheme and encourage any new person(s) with an interest land to reach out (albeit the Applicant does not anticipate that any such parties would not have been identified by the diligent inquiry already undertaken to date). Should any changes be identified, the Applicant will provide an updated Book of Reference and Schedule of Changes at the relevant deadline. However, such changes are only currently anticipated to arise in the context of 'ordinary course' changes in land ownership that are to be expected over time. The Applicant also refers to its response to Q6.0.2 above.

ExQ1	Question to:	Question:
Q6.0.6	Affected persons and interested parties	**Accuracy of the Book of Reference, Land Plans and points of clarification** Are any affected persons (APs) or IPs aware of any inaccuracies in the BoR [REP1-010], SoR [APP-032] or Land Plans ([REP1-004] and [REP1-005])? If so, please set out what these are and provide the correct details.
Q6.0.7	The applicant	**Scope and purpose of Compulsory Acquisition powers** Section 4 of the SoR [APP-032] considers the source and scope of the powers set out in the dDCO [REP1-006]. It is stated that land within the Order limits (OL) will be subject to a statutory authority to override easements and other rights, and to extinguish private rights of way upon the appropriation of the land for the purposes of the DCO. Please explain in further detail: • The need to seek such a wide-ranging power and why all such rights and easements cannot be specifically identified. • Why it is necessary to include powers of CA as a means of overriding existing rights and interests in or over land, as well as creating new rights over land, and granting the right to take temporary possession (TP) of land? • The nature and extent of any delay to the project that might otherwise result. • What alternatives to this approach have been explored?
		Provisions of the type set out in articles 25 (private rights) and 27 (power to override easements and other rights) of the **Draft DCO** (Doc Ref 3.1 Rev 3) are very well-precedented, appearing in, for example, the Fenwick Solar Farm Order 2026, the West Burton Solar Project Order 2025, the Cottam Solar Project Order 2024 and the Longfield Solar Farm Order 2023.

ExQ1	Question to:	Question:
		The reason that specific rights and easements cannot be specifically identified is because it is not possible for all such rights and easements to be known at this stage. Not all such rights are publicly documented, for example at the Land Registry, so it is not possible for the Applicant to exhaustively identify all such private rights that could be affected. Moreover, the extent to which specific private rights may need to be interfered with will not be known until detailed design is complete and the precise footprint of the Scheme is known. The Applicant would note that the application of articles 25 and 27 is limited to the extent that the relevant rights are inconsistent with the exercise of powers under the DCO, i.e. there is no blanket extinguishment (and where temporary possession is taken, private rights are suspended on a temporary basis only). This is therefore considered proportionate and the minimum interference required to deliver the Scheme. It is necessary to include powers to overriding existing rights and interests, as well as creating new rights and granting the right to take temporary possession, because each of these powers serve different purposes which are required to deliver the Scheme. Overriding of rights is necessary to ensure that (for example) easements held over the Order Limits do not restrict the ability to construct or operate the Scheme; new rights are required for ongoing operation (such as rights of oversail); and temporary possession is required for the purposes of siting of temporary infrastructure, such as construction compounds. It is not possible to quantify the likely delay or impacts of that delay that might arise in the absence of the powers sought in general terms – rather, any delay would be dependent on the specific land and rights affected. However, given that the powers sought are considered necessary to deliver the Scheme, the potential delay and impact is significant. For example, if a private right were to exist over the proposed site of a construction compound, and the inability to override that right prevented the placement of the construction compound, this could prevent construction of the

ExQ1	Question to:	Question:
		Scheme, because construction activities could not proceed in the absence of that construction compound. Given the well-precedented and standard nature of this provision, the Applicant considers the availability of practicable alternatives to be limited. More generally, the Applicant considers its approach to securing powers of compulsory acquisition to be proportionate and to allow interference with private land rights to be kept to the minimum required to construct, operate, maintain and ultimately decommission the Scheme.
Q6.0.8	The applicant	**Whether a compelling case in the public interest exists** Section 2.7 of the SoR [APP-032] states that the OL have been defined to allow sufficient flexibility to enable the final detailed design of the proposed development to be optimal. For the avoidance of doubt, please set out and justify the extent of the flexibility that the submitted scheme would allow in terms of limits of deviation (LoD) and parameters, providing dimensions where relevant. How would it be ensured that powers of CA would not be exercised in respect of land not ultimately required as a result of the detailed design process?
		The Applicant has applied limits of deviation (LoD) and the Rochdale Envelope approach, in order to provide an appropriate degree of flexibility for the detailed design, construction and delivery of the Scheme, whilst ensuring that the environmental effects assessed within the Environmental Statement represent a realistic worst-case scenario. LoD are a common feature of Nationally Significant Infrastructure Projects (NSIPs) and set the maximum extent of deviation allowed for permanent features, such as overhead lines (OHL), underground cables (UGC), cable sealing end compounds (CSECs) and new substations. This allows

ExQ1	Question to:	Question:
		for adjustment to the final position of said features to avoid unknown issues or constraints that may arise during detailed design and construction. The lateral LoD for the Grid Connection Route OHL is 50m either side of the centreline (100m in total) and the vertical LoD for the pylons is +7.4m. The LoD for the UGC is 75m either side of the centreline (150m in total), and for the CSECs it is 20m. For the Inter-Array OHL and UGC, the lateral LoD is 65m either side of the centreline (130m in total), and for the Substations, the LoD is 20m. All LoDs, other than the vertical LoD, are shown on the **Works Plans - Section A Solar Development Area** [APP-009] and **Works Plans - Section B Grid Connection** [APP-010], are further set out in of the **Draft Development Consent Order** (Doc Ref. 3.1 Rev 3), Article 6 and explained in **ES Chapter 2 The Scheme** [AS-017], Section 2.8. In terms of ensuring that CA powers would not be exercised in respect of land not ultimately required, the Applicant notes that the powers of compulsory acquisition within the draft DCO are expressly limited to that land required to deliver the Scheme. Article 21 (compulsory acquisition of land) reads: "*The undertaker may … acquire compulsorily* ***so much of the Order land as is required*** *for the authorised development or* ***to facilitate, or as is incidental****, to it*". That is, the undertaker is simply not empowered to acquire additional land which is neither required to facilitate nor incidental to the authorised development, and the extent of that land would be determined at detailed design stage. By way of example, the LoD discussed above provide for the construction of an OHL connecting the 400kV to the CSEC. The DCO does not empower the Applicant to construct works which do not accord with the description of Work No. 9 (or any other relevant Work No.) within Schedule 1. In turn, the Applicant could not secure CA powers for any works not in accordance with Schedule 1 and not forming part of the authorised development. There is therefore no mechanism for the Applicant to acquire land rights for purposes beyond the works described in Schedule 1, and no ability for it to acquire land unnecessarily.

ExQ1	Question to:	Question:
		Notwithstanding the position set out above, the Applicant would additionally note that it would be extremely inefficient and undesirable for unnecessary land to be acquired, given the administrative burden associated with exercise of compulsory purchase powers and the resulting compensation burden. The Applicant would not seek to generate compensation claims in respect of land not required to deliver the Scheme.
Q6.0.9	The applicant	**Whether a compelling case in the public interest exists** Section 7 of the SoR [APP-032] sets out the applicant's compelling case in the public interest for the proposed CA. Paragraph 7.2.3 asserts that the public benefits of the scheme would outweigh the adverse impacts on the interests of those who would be affected by the proposed use of CA powers. What assessment, if any, has been made of the effect upon individual APs and their private loss that would result from the exercise of CA powers in each case? • What is the clear evidence that the public benefit would outweigh the private loss and how has that balancing exercise between public benefit and private loss been carried out?
		The factors placed in the balance by the Applicant comprise, on the one hand, the private loss and interference arising from the acquisition of land and rights, and on the other, the substantial public benefits that would be secured through the delivery of the Scheme. In relation to private loss, the Applicant considered the nature and extent of the interests affected, the impact of the proposed compulsory acquisition and temporary possession powers on landowners, occupiers and other affected persons, the existing use of the affected land, and the extent to which impacts have been avoided or reduced through site selection, design development and engagement with affected persons. The Applicant understands that compulsory acquisition should only be exercised in circumstances where there is a compelling case in the public interest and

ExQ1	Question to:	Question:
		attempts to acquire land voluntarily have failed. Whilst the compensation code is intended to ensure that affected parties are paid a level of compensation which leaves them in no worse a position than they would have been in the no scheme world, the Applicant does not consider that it is the role of the compensation code to 'balance out' or justify exercise of compulsory acquisition powers. The Applicant acknowledges that compensation is a purely financial mechanism, and that the nature of the impacts and private loss experienced by affected parties may not always be such that financial compensation feels an adequate or appropriate remedy for those parties. The Applicant also had regard to the availability of compensation in accordance with the statutory compensation code and the requirement that no more land or rights are sought than are reasonably necessary for the delivery of the Scheme. Section 4.5 of the **Statement of Reasons** [APP-032] sets out the alternatives the Applicant has considered to compulsory acquisition. The DCO application does not provide a balancing exercise on a landowner by landowner basis, nor is it typical of a DCO application to do so. For those landowners most heavily impacted by the compulsory acquisition powers sought by the Scheme (i.e. the Solar Development Area), the approach has been to prioritise reaching a voluntary agreement due to the extent of impacts on them (i.e. unable to utilise the land for approximately 40 years). For the remainder of the landowners (i.e. the Grid Connection Route and Inter-Array Connections), the impacts are lesser, as the powers sought are predominantly rights. Existing land uses should be able to continue around the overhead lines and cabling for the most part, There will still be some imposition, for example, the CSECs and pylon bases, however, based on engagement and the Applicant's understanding of the landholdings to date, the Applicant does not consider this infrastructure would place an undue burden on landowners and tenants. How this relates to any interference with Human Rights is set out in response to the relevant questions below. In relation to the public interest, the Applicant attributed substantial weight to the urgent and established need for new electricity infrastructure identified in EN-1, including paragraphs 3.2.8 and

ExQ1	Question to:	Question:
		3.2.9, which confirm that there is an urgent need for the relevant types of energy infrastructure and that substantial weight should be given to that need. Substantial weight was also attributed to the need for new renewable electricity generation and the contribution of solar infrastructure towards energy security, decarbonisation and net zero, as recognised in EN-1 paragraphs 3.3.58 to 3.3.63 and EN-3 paragraphs 1.1.1 to 1.1.3, 2.1.6 and 2.1.7. The Applicant also attributed substantial weight to the Scheme's contribution towards the delivery of Critical National Priority infrastructure. The **Planning Statement** [APP-260], along with the accompanying **National Policy Statement Accordance Tables** [APP-262], provide extensive reference to NPSs EN-1, EN-3 and EN-5 describing the public benefits that would arise. The Applicant has considered that the benefits of the Scheme can only be realised if the DCO includes powers of compulsory acquisition and temporary possession. The balancing exercise was undertaken having regard to the principles set out in paragraphs 8, 12, 13 and 14 of the Planning Act 2008 CA Guidance related to procedures for the compulsory acquisition of land. The Applicant considered whether the land and rights sought are necessary for the delivery of the Scheme, whether reasonable alternatives had been considered, whether impacts on affected persons had been minimised, and whether the public benefits of the Scheme outweigh the private loss arising from the proposed powers. As concluded at paragraph 7.2.10 of the **Statement of Reasons** [APP-032], the Applicant considers that the public interest of the Scheme outweighs the effects of the provisions in the **Draft DCO** [REP1-006] upon persons who own property in the Order Limits, and there would not be a disproportionate interference with their Article 8 and Article 1, First Protocol Rights.
Q6.0.10	The applicant	**Whether a compelling case in the public interest exists** Paragraph 4.5.2 of the SoR [APP-032] states that the applicant has taken steps to engage with those persons with affected land interests.

ExQ1	Question to:	Question:
		Please provide further details, with examples where available of: • How has such engagement helped to shape the proposals and enabled the applicant to make changes to designs to minimise the private loss? • How has the direct engagement given the applicant a better understanding of the direct and indirect impacts on persons with affected land interests? • Please provide detail, where available, of any direct and indirect impacts thereby identified.
		Paragraph 4.5.2 of the **Statement of Reasons** [APP-032] summarises the Applicant's engagement with persons with affected land interests. Feedback from that engagement, and from consultation more widely as recorded in the **Consultation Report** [APP-037], has also been fed into the design process. Engagement has led to a number of changes to the design, as recorded in Section 6 of the **Design Approach Document** [APP-268]. These include: (a) Farming practices - Multiple pylon locations have been moved closer to field boundaries to reduce the effect on farming operations, in response to input from landowners. (b) Residential properties - The Grid Connection Route has been realigned to increase the distance from a property at Delgate Bank, following specific consultation feedback. At Martins Farm, PV panels have been removed from the field to the south west (previously proposed at Stage 2 Consultation) and the adjacent pasture to the north west has been removed from the Order Limits, creating a greater buffer from Martins Farm and Martins Farm Cottage.

ExQ1	Question to:	Question:
		A minimum 80m offset of PV panels is provided from the northern boundary of properties off Hull's Drove and the B1166 north west of Shepeau Stow, and an offset of approximately 50m is provided from the southern boundary hedge at Cloot House to maintain open views. Infrastructure has also been kept out of the fields north and south of properties at Martins Road, and out of the northern section of Parcel B south of Queen's Bank. (c) Cabling technology and the Gliding Club - Underground cabling was selected for the Inter-Array Connection between the 132kV substation in Parcel A and the 400kV substation in Parcel B, primarily in response to consultation feedback and the potential safety and operational effects of an Overhead Line on the Peterborough and Spalding Gliding Club at Crowland Airfield. No infrastructure is sited in Parcel A directly to the west of the club, to reduce potential effects on its operations. (d) Design choices informed by landowner knowledge - The landowner advised the Applicant of a historic World War II aircraft crash site in Parcel D. Drawing on that local knowledge, the Applicant identified a potential UXO risk and removed a parcel at D4 from proposed PV panelling. The area is retained within the Order Limits with utilisation for environmental mitigation and enhancement. (e) Additional Land offered through consultation - Following feedback received at Stage 2 Consultation, four additional parcels within Parcel D were included for Solar PV from two separate landowners. Engagement with landowners, occupiers, their agents and the Land Interest Group (LIG) is continuing and is improving the Applicant's understanding of how the land is occupied and used, including the nature of occupation and any tenancies, the access routes and field entrances, drainage and farm operations. This is informing the Applicant's consideration of micro-siting within

ExQ1	Question to:	Question:
		the limits of deviation to address concerns raised by Affected Person(s), as well as the accuracy of the Book of Reference (Doc Ref. 4.3. Rev 3). The Applicant has sought to identify and mitigate impacts as far as currently possible, and shall continue to seek to mitigate and reduce impacts as part of the ongoing engagement with the Affected Persons. However, certain impacts cannot be avoided and all Affected Persons are entitled to compensation under the compensation code, as explained in the **Statement of Reasons** [APP-032]. The Applicant considers that this engagement, and the changes made as a result, show that losses are being minimised so far as reasonably practicable, and that the interference that remains is proportionate when weighed against the public benefit of the Scheme, as set out in section 8 of the **Statement of Reasons** [APP-032] and the **Planning Statement** [APP-260].
Q6.0.11	The applicant	**Whether a compelling case in the public interest exists** What weight has the applicant attached to the compensation that would be available to those entitled to claim it under the relevant provisions of the National Compensation Code in its assessment of private loss?
		Whilst the Applicant has had regard to the availability of compensation in accordance with the statutory compensation code in assessing the extent of private loss, this has not been a significant or determining factor to which any particular weight has been attached in its assessment of the compelling case in the public interest justifying the exercise of compulsory acquisition powers. The Applicant understands that compulsory acquisition should only be exercised in circumstances where there is a compelling case in the public interest and attempts to acquire land voluntarily have failed. Whilst the compensation code is intended to ensure that affected parties are paid a level of compensation which leaves them in no worse a position than they would have been in the no scheme world, the Applicant does not consider that it is the role of the compensation code to

ExQ1	Question to:	Question:
		'balance out' or justify exercise of compulsory acquisition powers. The Applicant acknowledges that compensation is a purely financial mechanism, and that the nature of the impacts and private loss experienced by affected parties may not always be such that financial compensation feels an adequate or appropriate remedy for those parties. In these circumstances, whilst continuing to pursue voluntary agreements with affected parties so far as possible, the Applicant has also assessed the degree of non-financial impact that the Scheme would have on affected parties, and the extent to which those impacts have been reduced and mitigated, balanced with the established need for the Scheme and the significant public benefits that it would deliver. In this context, the Applicant refers to its responses to Q6.0.12, Q6.0.14 and Q6.0.15. In particular, the Applicant notes the limited interface between the Scheme and residential dwellings, and the principles set out within the **Design Approach Document** [APP-268] which have been established as part of the Applicant's efforts to limit impacts on affected persons.
Q6.0.12	The applicant	**Justification for interfering with the Human Rights of those with an interest in the land affected** What degree of importance has been attributed to the existing uses of the land proposed to be acquired in assessing whether any interference would be justified, and why?
		The existing uses of the land proposed to be acquired was an important factor in the assessment of whether any interference with human rights of affected persons would be justified. In particular, as set out in the **Statement of Reasons** [APP-032], in relation to Article 8 of the Convention, the Applicant has ensured that the Order Limits do not include, and the Scheme does not require, the outright acquisition of any residential dwelling-houses. Consequently, as dwelling-houses will not be directly affected, it is not anticipated that the Convention rights protected by Article 8 will be infringed.

ExQ1	Question to:	Question:
		As also set out within the **Statement of Reasons** [APP-032] and **ES Chapter 2: The Scheme** [AS-017], agriculture is the existing primary land use within the Site, and indeed option agreements for the voluntary acquisition of land have been entered into with relevant landowners for the large majority of the Solar Development Area (Land Parcels B and C, and most of D). **ES Chapter 14: Socio-Economics and Land Use** [APP-065] concludes that no direct or severance effects are expected on residential properties, business (other than agricultural businesses), community facilities, open space, or visitor attractions. It also notes that, during operation of the Scheme, hosting of the Scheme will provide a diversified source of income for landowners within the Solar Development Area (most of whom have entered into voluntary option agreements, as above), resulting in a minor beneficial effect. Nor is it considered that the Scheme would compromise the overall viability of agricultural land holdings within these areas. In respect of the Grid Connection Route, the Applicant notes that existing agricultural uses are generally expected to be able to resume around the newly constructed OHL on completion of construction. In this context, having regard to the existing uses of the land within the Order Limits and noting the critical need for the Scheme, the Applicant has concluded that the significant public benefits outweigh any effects on persons who own interests in relevant land or who may be affected by the Scheme, and as such that Article 1 of the Convention is not infringed.
Q6.0.13	The applicant	**Justification for interfering with the Human Rights of those with an interest in the land affected** In relation to the applicant's duties under s149 of the Equalities Act 2010: Please explain how the applicant has had regard to its public sector equality duty in relation to the powers of CA sought and where this can be identified within the application. • Have any APs been identified as having protected characteristics?

ExQ1	Question to:	Question:
		The Applicant has not identified any affected persons as having protected characteristics. The Applicant's diligent inquiry process is focused on the confirmation of land interest based on desk-based sources (such as HM Land Registry) and publicly available information, as opposed to the personal characteristics of landowners or occupiers. However, the Applicant has had regard to the Equalities Act 2010 in relation to the powers of CA sought. For example, the Consultation Report [APP-037] explains how the Applicant ensured that consultation and engagement undertaken in respect of the Scheme was accessible and inclusive (for example, ensuring wheelchair access and availability of documents in alternative formats and languages where requested), and sought to engage all members of the community, including local interest groups and seldom-heard groups. This broader engagement also did not identify any affected persons with protected characteristics. Regardless, the Applicant has ensured that all persons engaged in respect of potential CA of their land have been treated without discrimination.
Q6.0.14	The applicant	**Justification for interfering with the Human Rights of those with an interest in the land affected** Paragraph 7.2.10 of the SoR [APP-032] states that the applicant has considered the balance to be struck between individual rights and the wider public interest. Explain more precisely the factors which have been placed in the balance (including references to any paragraphs of any relevant National Policy Statement (NPS) and Government Guidance), the weight attributed to those factors and how this exercise has been undertaken?
		The factors placed in the balance by the Applicant comprise, on the one hand, the private loss and interference arising from the acquisition of land and rights, and on the other, the substantial public benefits that would be secured through the delivery of the Scheme. In relation to private loss, the Applicant considered the nature and extent of the interests affected, the impact of the proposed compulsory acquisition and temporary possession powers on

ExQ1	Question to:	Question:
		landowners, occupiers and other affected persons, the existing use of the affected land, and the extent to which impacts have been avoided or reduced through site selection, design development and engagement with affected persons. The Applicant also had regard to the availability of compensation in accordance with the statutory compensation code and the requirement that no more land or rights are sought than are reasonably necessary for the delivery of the Scheme. Section 4.5 of the **Statement of Reasons** [APP-032] sets out the alternatives the Applicant has considered to compulsory acquisition. EN-5, paragraph 2.6.4, expresses that in some cases permanent acquisition of rights may be preferrable over voluntary wayleaves due to greater reliability and economic efficiency. The Applicant has sought to reach voluntary agreement in the first instance, but proposes acquisition of rights in the event agreement cannot be reached. It does not propose to rely on voluntary wayleaves for the reasons set out in paragraph 2.6.4 (e.g. can be terminable on notice by the landowner). Permanent acquisition of land, beyond the Solar Development Area, is only sought for the CSECs, which aligns with the position set out in EN-5, paragraph 2.6.5, for electricity networks infrastructure beyond lines and cables. There are no technology-specific policies within EN-3 relating to the compulsory acquisition of land or rights for renewable energy infrastructure. In relation to the public interest, the Applicant attributed substantial weight to the urgent and established need for new electricity infrastructure identified in EN-1, including paragraphs 3.2.8 and 3.2.9, which confirm that there is an urgent need for the relevant types of energy infrastructure and that substantial weight should be given to that need. Substantial weight was also attributed to the need for new renewable electricity generation and the contribution of solar infrastructure towards energy security, decarbonisation and net zero, as recognised in EN-1 paragraphs 3.3.58 to 3.3.63 and EN-3 paragraphs 1.1.1 to 1.1.3, 2.1.6 and 2.1.7. The Applicant also attributed substantial

ExQ1	Question to:	Question:
		weight to the Scheme's contribution towards the delivery of Critical National Priority infrastructure. The **Planning Statement** [APP-260], along with the accompanying **National Policy Statement Accordance Tables** [APP-262], provide extensive reference to NPSs EN-1, EN-3 and EN-5 describing the public benefits that would arise. The Applicant has considered that the benefits of the Scheme can only be realised if the DCO includes powers of compulsory acquisition and temporary possession. The balancing exercise was undertaken having regard to the principles set out in paragraphs 8, 12, 13 and 14 of the Planning Act 2008 CA Guidance related to procedures for the compulsory acquisition of land. The Applicant considered whether the land and rights sought are necessary for the delivery of the Scheme, whether reasonable alternatives had been considered, whether impacts on affected persons had been minimised, and whether the public benefits of the Scheme outweigh the private loss arising from the proposed powers. As concluded at paragraph 7.2.10 of the **Statement of Reasons** [APP-032], the Applicant considers that the public interest of the Scheme outweighs the effects of the provisions in the **Draft DCO** [REP1-006] upon persons who own property in the Order Limits, and there would not be a disproportionate interference with their Article 8 and Article 1, First Protocol Rights.
Q6.0.15	The applicant	**Justification for interfering with the Human Rights of those with an interest in the land affected** Sections 4, 7 and 8 of the SoR [APP-032] state that to the extent that the DCO would affect individuals' rights, the proposed interference with those rights would be in accordance with law, proportionate and justified in the public interest. How has the proportionality test been undertaken? • Explain further the proportionate approach which has been taken in relation to each plot?

ExQ1	Question to:	Question:
		The Applicant notes that there is no statutory test or guidance on how a proportionality test is to be undertaken, and refers to its responses to Q6.0.12 and Q6.0.14 above. Given the significant benefits to be delivered by the Scheme, and having regard to the existing land uses within the Order Limits and the extent of human rights interferences and other impacts on affected persons identified, the Applicant has concluded that those impacts are proportionate. In respect of the proportionate approach taken with respect to each plot, as set out in Q6.0.12 above, the Applicant has ensured that the Scheme does not require the outright acquisition of any residential dwelling-houses. The Applicant also refers to the various controls within the Application to limit impacts on affected persons and individual plots. For example, the **Design Approach Document** [APP-268] sets out ten Design Principles reflecting the key considerations guiding design development, including: • Principle 2: Seek to integrate the Scheme sensitively within the landscape to reduce the potential landscape and visual effects where practical. • Principle 3: Seek to incorporate opportunities to enhance local recreation and access. • Principle 4: Ensure responsible construction, ongoing maintenance and decommissioning. • Principle 6: Minimise effects on agricultural productivity and safeguard long-term agricultural capability of the land. In addition, the **Statutory Nuisance Statement** [APP-271] sets out the extent to which the Scheme engages the matters in section 79(1) (statutory nuisances and inspections therefor) of the Environmental Protection Act 1990 and how the Application proposes to mitigate or limit the effects. As such, the Applicant's approach to proportionality has encompassed both identifying land parcels with low potential for human rights interferences and incorporating measures into the Scheme and

ExQ1	Question to:	Question:
		Application to ensure that any impacts are mitigated and limited, and then balancing any residual impacts against the very significant public benefits to be delivered by the Scheme.
Q6.0.16	The applicant	**Scope and purpose of the Compulsory Acquisition powers** Article 24 (compulsory acquisition of rights) of the dDCO [REP1-006] would allow Meridian Solar Farm Limited to compulsorily acquire existing and new rights, as well as impose restrictive covenants over land. Please provide an indication of the anticipated content and/ or an initial draft of any restrictive covenants intended to be imposed. • Should a requirement for consultation with relevant owners/ occupiers as regards the drafting of any such restrictive covenants be imposed?
		The Applicant has included a new Schedule 9 of the **Draft DCO** (Doc Ref. 3.1 Rev 3) for Deadline 3 to address this ExQ1 and various others including Q7.0.2 and Q7.0.6. This has shifted the breakdown of impacted plots from the Book of Reference to the dDCO for clarity, and included a more detailed breakdown of the types of rights associated with each class of right sought under the Order, which provides greater transparency with respect to the types of matters that may be secured pursuant to this article. At this early stage, the Applicant is not in a position to provide any specific drafting proposed for covenants beyond these extrapolated rights, as this would be dependent on matters such as the nature of the affected land, relevant component of the Scheme, and the outcome of detailed design. However, the new drafting at Schedule 9 provides the scope of such covenants including for example, matters such as restrictions on building over areas to which maintenance access is required, erecting structures in close proximity to overhead lines, and similar matters.

ExQ1	Question to:	Question:
		The Applicant also notes that the ability to impose restrictive covenants is limited to any purpose for which the relevant land may be acquired under article 21, or in respect of land where only new rights are sought, to the purpose specified in relation to that land in Schedule 9. In this context, and given that affected parties have already been subject to significant consultation as part of preparation of the DCO Application, the Applicant does not consider it necessary or proportionate to incorporate a further requirement for consultation in respect of the drafting of restrictive covenants. The Applicant is not aware of any precedent for such an approach, and in that context is unclear what proportionate or practicable form such consultation could take.
Q6.0.17	Lincolnshire County Council South Holland District Council	**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.
Q6.0.18	The applicant	**Whether adequate funding is available** The CA Guidance, paragraph 17, considers the resource implication of the proposed development. In the light of that guidance and noting the detail within the Funding Statement (FS) [APP-033], please set out the degree to which other bodies (public or private sector) have agreed to make financial contributions or to underwrite the scheme, and the basis upon which any such contributions or underwriting is to be made.

ExQ1	Question to:	Question:
		The Funding Statement [APP-033] explains that the Applicant and the Scheme are currently funded by Bagnall Energy Limited, an energy investment fund managed by Downing LLP. The Scheme currently benefits from sufficient funding to progress the DCO Application and to meet any early acquisition costs that may arise at this stage. It may be that, at a future stage of Scheme delivery, Bagnall Energy Limited could need to seek additional funding from the private sector, but the specific details of any such additional funding have not yet been confirmed. This would be progressed at the appropriate time, well ahead of need for those funds arising, in order to ensure that the Scheme can be delivered by the Applicant as intended. This position is reflective of a funding structure which is very common for privately delivered solar schemes of this type.
Q6.0.19	The applicant	**Whether adequate funding is available** It is noted that the final funding approach for the proposed development has not been formally agreed (paragraph 2.3.3 of [APP-033]). In light of paragraph 18 of the CA Guidance, what evidence is there to demonstrate that adequate funding is likely to be available to enable the CA within the statutory period following any DCO being made?
		The Applicant refers to its response to Q6.0.18 above. The Applicant's funding structure, as evidenced in the **Funding Statement** [APP-033] (in particular the Letter of Support at Appendix B) and above, ensures that adequate funding (in accordance with the tests laid out in the CA Guidance) is available to enable CA within the statutory period for implementation. In particular, as set out at Q6.0.18 above, the Scheme currently benefits from sufficient funding to progress the DCO Application and to meet any early acquisition costs that may arise at this stage. The Applicant confirms that the Final Investment Decision (FID) in respect of the Scheme will need to be made in due course, following the grant of consent and once the Scheme has secured its Gate 2 connection offer (as set out in the Applicant's response to Q3.0.9), and that this will be made within the

ExQ1	Question to:	Question:
		statutory timescales of the DCO. Once FID has been made all further monies required will be available for CA and the commitments made through the DCO.
Q6.0.20	The applicant	**Whether adequate funding is available** Please summarise the evidence relied upon to support the conclusion that there is a reasonable prospect that the scheme, if granted consent, would actually be taken forward and in what time period?
		The Applicant refers to its responses to Q6.0.18 and Q6.0.19 above which demonstrate the availability of funding required to deliver the Scheme in accordance with the requirements of the CA Guidance. Beyond this, the Applicant is committed to delivering the Scheme, should it be consented, and has expended considerable sums in the development of the Scheme and promotion of the DCO Application to date. The Applicant would note that Bagnall Energy Limited are similarly invested in timely delivery of the Scheme in order to secure returns for their investors. The Applicant acknowledges that FID is critical to ensuring that the Scheme will come forward, and that, as explained in the Applicant's response to Q3.0.9, this will be progressed following grant of consent and receipt of a Gate 2 connection offer for the Scheme. It is for this reason that the draft DCO (Doc Ref. 3.1 Rev 3) seeks seven years to implement, to allow sufficient time for a Gate 2 offer to be secured.
Q6.0.21	The applicant	**Whether adequate funding is available** Section 2 of the FS [APP-033] states that an estimate of the amounts necessary to cover the payment of compensation associated with the exercise of any CA powers granted has been considered in the overall project cost. Please provide an estimate of the cost of land acquisition, the nature of the expert advice taken to provide the figure and the basis for and reliability of this estimate.

ExQ1	Question to:	Question:
		The estimate was prepared by representatives of WSP's Land Negotiations team, with experience of rural land and property and compensation and valuation matters. The estimate has been prepared in accordance with the Compensation Code on the basis of Market Value and by applying the no-scheme world assumption set out in section 6A of the Land Compensation Act 1961. This requires any increase or decrease in the value of the land attributable to the scheme to be disregarded. The cost estimate adopts a worst-case scenario approach to mitigate the risks associated with preparing a desktop valuation for a large area of land and assessing the likely outcomes of negotiations. There may be matters that affect the valuation but are not currently known, including tenancy details and physical factors affecting the land and property. In compiling the estimate as accurately as possible, WSP's Land Negotiations team has drawn on its considerable experience of negotiating claims under the Compensation Code. A contingency has been included to reflect the inherent degree of valuation risk. The estimate was prepared as a desktop study and represents our best assessment of the likely outcomes of negotiations under the Compensation Code, based on the information available. The property cost estimate includes the value of overground and underground easements over the land; an allowance for likely injurious affection claims relating to retained land; disturbance arising from the temporary occupation of land; home loss, basic loss and occupiers' loss payments; claimants' fees; and statutory interest under the Acquisition of Land (Rate of Interest after Entry) Regulations 1995. The total land acquisition cost is estimated to be between £12 million and £13 million, including contingency. This sum forms part of the overall total estimate provided at Section 2.4 of the Funding Statement [APP-033].

ExQ1	Question to:	Question:
		As the majority of the affected land is arable land, we have assumed a worst-case scenario a freehold land value of £15,000 per acre has been adopted, representing the upper end of the range in price per acre that arable land transacts for. A contingency has been included to reflect the inherent degree of valuation risk. The estimate was prepared as a desktop study and represents our best assessment of the likely outcomes of negotiations under the Compensation Code, based on the information available. The figures above form part of the total estimate provided for at Section 2.4 of the Funding Statement [APP-033].
Q6.0.22	The applicant	**Whether adequate funding is available** Please confirm whether the cost estimate provided in the FS [APP-033] includes the full costs associated with the decommissioning of the proposed development.
		The Applicant confirms that the estimate in the **Funding Statement** [APP-033] at Section 2.2 and 2.2.2 does include estimated costs for the decommissioning of the Scheme.
Q6.0.23	The applicant	**Funding and accounts** Please provide annual financial statements dated 31 December 2025, including balance sheets, for Bagnell Energy Ltd. Please provide unredacted and redacted versions.
		As shown in Appendix B to the **Funding Statement** [APP-033], Bagnall Energy Limited has provided a letter of support detailing the funding and availability of funds to deliver the Scheme. The Applicant has also attached, at **Appendix B,** the Annual Report and Accounts for FY25 for Bagnall Energy Limited (dated September 2025). Bagnall Energy Limited's accounts are also publicly available at Companies House (https://find-and-update.company-information.service.gov.uk/company/08349679/filing-history).

<table>
<tr><th>ExQ1</th><th>Question to:</th><th>Question:</th></tr>
<tr><td>Q6.0.24</td><td>The applicant</td><td>Funding Statement

Paragraph 2.1.2 of the FS [APP-033] states that Downing LLP has "significant experience in owning and operating renewable energy, battery storage and other infrastructure". Please provide details of such infrastructure.

Please also provide detail of the 6-gigawatt pipeline of projects within the UK, as stated at paragraph 2.1.4 of the FS.</td></tr>
<tr><td></td><td></td><td>Downing LLP, on behalf of their investment funds, owns and operates a broad portfolio of renewable energy assets across the UK and Nordics spanning multiple technologies including solar PV, hydropower, onshore wind, battery energy storage systems and grid stability assets. These assets, of over £1b value and over 710MW capacity, are managed by Downing's in-house asset management team (with ~40 full-time personnel), as evidenced on the Downing website at: https://institutional.downing.co.uk/renewable-energy.

In addition to this, Downing, through their project development and delivery business, Downing Renewable Developments (with ~50 full-time personnel),have an extensive renewable energy development pipeline across the UK and Nordics of ~6GW, with a list of example projects as follows:

<table>
<tr><th>Project Name</th><th>Location</th><th>Capacity</th><th>Current Status</th></tr>
<tr><td>Meerdyke Solar</td><td>UK</td><td>49.9MWp</td><td>Development Complete</td></tr>
<tr><td>Edwin Richards BESS</td><td>UK</td><td>100MW</td><td>Development Complete</td></tr>
<tr><td>Heanor BESS</td><td>UK</td><td>40MW</td><td>Development Complete</td></tr>
<tr><td>Fair Park Solar</td><td>UK</td><td>49.9MW</td><td>Development Complete</td></tr>
<tr><td>Limes Farm Solar</td><td>UK</td><td>20MW</td><td>Development Complete</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>ExQ1</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Freeby Solar</td><td>UK</td><td>42MW</td><td>Awaiting planning determination.</td></tr>
<tr><td>Springbank BESS</td><td>UK</td><td>50MW</td><td>Development Complete</td></tr>
<tr><td>Toronto Solar</td><td>UK</td><td>27MW</td><td>Awaiting planning determination</td></tr>
<tr><td>Green Lane Solar</td><td>UK</td><td>23MW</td><td>Development process ongoing</td></tr>
<tr><td>Meridian Solar</td><td>UK</td><td>750MW</td><td>Planning examination ongoing.</td></tr>
<tr><td>Kingsway Solar</td><td>UK</td><td>500MW</td><td>Development process ongoing</td></tr>
<tr><td>Relletinsuo Solar / BESS</td><td>Finland</td><td>126MWp</td><td>Development Complete</td></tr>
<tr><td>Suitia Solar / BESS</td><td>Finland</td><td>82MWp</td><td>Development process ongoing</td></tr>
<tr><td>Kotiranta Solar / BESS</td><td>Finland</td><td>82MWp</td><td>Development process ongoing</td></tr>
<tr><td>Liisanniitu Solar / BESS</td><td>Finland</td><td>82MWp</td><td>Development process ongoing</td></tr>
<tr><td>Kimi BESS</td><td>Finland</td><td>20MW</td><td>Construction Ongoing</td></tr>
<tr><td>Higher Hawkerland Solar</td><td>UK</td><td>14MW</td><td>Pre-Construction Ongoing</td></tr>
<tr><td>Kemberton Solar</td><td>UK</td><td>20MW</td><td>Pre-Construction Ongoing</td></tr>
<tr><td>Low Farm Solar</td><td>UK</td><td>79MW</td><td>Pre-Construction Ongoing</td></tr>
<tr><td>New Hall Solar</td><td>UK</td><td>30MW</td><td>Pre-Construction Ongoing</td></tr>
<tr><td>Higher Witheven</td><td>UK</td><td>55MW</td><td>Pre-Construction Ongoing</td></tr>
</table>

Further details can be found here: https://downing-renewables.co.uk/Projects
</td></tr>
<tr><td>Q6.0.25</td><td>The applicant</td><td>Other matters
In the light of the CA Guidance, paragraph 19, please demonstrate:
How potential risks or impediments to implementation of the scheme have been properly managed.</td></tr>
</table>

ExQ1	Question to:	Question:
		• The account taken of any other physical and legal matters pertaining to the application including the programming of any necessary infrastructure accommodation works and the need to obtain any operational and other consents applicable to this type of development.
		The Applicant has sought to proactively manage any risks and impediments to the Scheme throughout development of its proposals. The Applicant is aware that the representations made by NGET in respect of its Grimsby to Walpole transmission project could be seen as an impediment to the Scheme. The Applicant's position in respect of the potential conflict between the two projects, and the progress being made towards resolving these matters, is set out in various responses within this document (see for example its response to Q2.0.8). These confirm that the Applicant has enabled sufficient flexibility within its Scheme to ensure the two projects can successfully manage any interactions and avoid impediments to the other. The Applicant is not presently aware of any other physical or legal impediments to the Scheme not already accounted for within the powers sought under the **Draft DCO** (Doc Ref. 3.1 Rev 3), save for those secondary consents identified in the **Schedule of Other Consents and Licences** [APP-030]. As set out in the Applicant's response to Q3.0.1, the majority of the consents identified in that document are to be obtained post-consent / pre-construction, as is standard in the context of nationally significant infrastructure projects.
Q6.0.26	The applicant	**Neighbourhood Planning Act 2017** Given the parliamentary approval to the TP regime under the Neighbourhood Planning Act 2017 (NPA 2017), which was subject to consultation and debate before being enacted (and which, by virtue of article 7(1)(h) of the dDCO [REP1-006], the applicant is seeking to disapply), should any provisions relating to notices/ counter notices which do not reflect the NPA 2017 proposed regime, not yet in force, be modified to more closely reflect the incoming statutory regime where possible?

ExQ1	Question to:	Question:
		As examples: The notice period that will be required under the NPA 2017 Act is 3 months, substantially longer than the two weeks' required under articles 19(5) and 20(2) respectively. Other than prior precedent, what is the justification for only requiring two weeks' notice in this case? Under the NPA 2017, the notice would also have to state the period for which the acquiring authority is to take possession. Should such a requirement be included in this case? • Powers of TP are sometimes said to be justified because they are in the interests of landowners, whose land would not then need to be acquired permanently. The NPA 2017 Act provisions include the ability to serve a counternotice objecting to the proposed temporary possession so that the landowner would have the option to choose whether temporary possession or permanent acquisition was desirable. Should this article make such a provision, whether or not in the form in the NPA 2017?
		As the Examining Authority notes, the Neighbourhood Planning Act 2017 (NPA 2017) is not in force and does not therefore constitute good precedent for the purposes of nationally significant infrastructure project consenting. The Applicant notes the Examining Authority's reference to articles 19 and 20. These articles deal with powers to enter on to land for the purposes of undertaking protective works to buildings and carrying out monitoring and surveys respectively. As such, they do not grant powers of temporary possession of land in the same way that articles 31 and 32 (temporary use of land for constructing and maintaining the authorised development respectively) do, and instead serve a slightly different purpose. Notwithstanding this, as the Examining Authority has also noted, the two-week notice period proposed is very well-precedented (in, for example, the Fenwick Solar Farm Order 2026, the West

ExQ1	Question to:	Question:
		Burton Solar Project Order 2025 and the Cottam Solar Project Order 2024). Irrespective of this precedent, it is considered appropriate in the present case on the basis that the Scheme, being of critical national priority, must be able to proceed without undue delay. Given the nature of the powers secured by articles 19 and 20, the Applicant does not consider if necessary for any such notice to specify the period for which possession would be taken. In respect of articles 31 and 32, which do grant powers of temporary possession, the period over which temporary possession can be taken is inherently time-limited by articles 31(4) and 32(4). Again, given the nature of the powers secured by articles 19 and 20, the Applicant does not consider that it would be appropriate for these articles to incorporate a mechanism for service of a counternotice requiring permanent acquisition. In respect of articles 31 and 32, as the Examining Authority has noted, the power of temporary possession is intended to ensure a proportionate approach to compulsory acquisition where land is not acquired permanently unnecessarily. As temporary possession constitutes a less onerous interference than permanent acquisition, and given the status of the NPA 2017, the Applicant does not consider a counternotice mechanism to be necessary.
Q6.0.27	The applicant	**Grid connection** In the event that a grid connection is not secured by the close of the examination, please explain whether the applicant considers that a compelling case in the public interest for the proposed development would still exist. If so, please provide a detailed justification, including how the benefits of the proposed development would outweigh any uncertainty associated with the absence of a secured grid connection. Please confirm whether any alternative grid connections are likely to be/ are available to the applicant outside of the Weston Marsh locality?

ExQ1	Question to:	Question:
		EN-1, paragraph 4.11.6 allows applicants to take a commercial risk where they have not received or accepted a formal offer for a network connection. The absence of a secured grid connection by the close of examination would not alter the national need for the Scheme or the substantial public benefits that it would deliver. The Applicant considers that a compelling case in the public interest would continue to exist. The need for the Scheme is established through the relevant National Policy Statements, and is not contingent upon a connection offer being secured at a particular stage of the DCO application process. Whilst there may remain some uncertainty regarding the timing and form of a future connection offer, that uncertainty does not affect the planning merits of the Scheme or the public benefits reported within the DCO application. Rather, it represents a commercial delivery risk for the Applicant. The Applicant would not proceed with the construction of the Scheme, or exercise powers of compulsory acquisition, unless a viable grid connection solution had been secured. In light of the above, the Applicant considers that the benefits of the Scheme would continue to outweigh any uncertainty associated with the absence of a secured grid connection at the close of examination and that a compelling case in the public interest would remain. The Applicant has not identified or assessed alternative grid connection options beyond the Weston Marsh locality, with the exception of a tee-in connection to the planned Grimsby to Walpole overhead line which NGET do not view as a technically deliverable alternative. The Applicant is therefore not in the position to confirm whether any alternative connection options exist or would be available outside of the Weston Marsh locality.
Q6.0.28	The applicant	**Limits of deviation**

ExQ1	Question to:	Question:
		In general, the flexibility given by the proposed LoD to accommodate detailed design development, ground conditions and construction practicalities is understood. However, in respect of Works Plan Section B Grid Connection [APP-010], it is evident that there are significant areas of land between the proposed LoD and the OL. Please provide a technical justification for the extent of the additional land take, including an explanation of why it is necessary to retain these areas within the OL.
		The areas of land beyond the Limits of Deviation (LoD) for the Overhead Lines (OHL), Underground Cable (UGC) and Cable Sealing End Compounds (CSECs) that are captured in the Order Limits are required for temporary construction land take, such as the construction access points (bell mouths), construction haul roads, working areas, stringing positions and temporary construction compounds. For example, on **Works Plans - Section B Grid Connection** [APP-010], Sheet 4, the areas east, west and south of pylon 4SV32 within Work No. 13 is for the angle pylon stringing position and temporary construction haul road, and on Sheet 1, flexibility has been retained in the field west of 4SV7 for locating the temporary construction compound. In addition to the LoD for the overhead line (OHL), underground cable (UGC) and cable sealing end compounds (CSECs), a degree of flexibility has been incorporated into the design for the temporary construction land take in the form of a 20m buffer around pylon working areas, stringing positions and crossing protection. This enables the construction land take to move within the Order Limits to align with the location of pylons following micro-siting as part of detailed design. Due to the illustrative nature of the design, it is important to include an appropriate degree of flexibility for the detailed design, construction and delivery of the Scheme. The extent of the temporary works sought is also in general accordance with comparable transmission NSIPs. In addition to the above, the Order Limits also include future operational and maintenance accesses to the overhead line and pylons, as well as allowance in the Order Limits for provision of access and

ExQ1	Question to:	Question:
		mitigation works for Distribution Network Operator (DNO) assets, as set out in **Written Summary of Oral Submissions at ISH1** [REP1-098], Section 2. The **Land and Crown Land Plans – Section A** [REP1-004] and **Land and Crown Land Plans – Section B** [REP1-005] help distinguish between areas required for temporary construction and land required for future permanent operational and maintenance accesses.
Q6.0.29	The applicant	**Land Rights Tracker (LRT)** Where relevant, please re-insert 'Written representation reference number', 'Other document reference number' and 'Applicant's response references' into the LRT [REP1-012]. For each entry in the LRT (category 1 section), which is shaded blue, please provide additional information explaining why the relevant agreement is not considered necessary.
		The Applicant acknowledges the suggested changes provided by the ExA and will look to update the **Land Rights Tracke**r (Doc Ref. 4.3 Rev 3) and will look to incorporate these changes by Deadline 4 of the examination. The Applicant has identified two categories of parties who fall within the shaded blue; Occupiers or Tenants (**Andrew Pearce, David Fletcher, George Hay & Sons Limited, GT4 Auto Repair Services, H Sly and Sons Limited, J. H. Grundy (Farms) Limited, L & D Flowers Limited, M L Smith & Sons Limited, M. S. Smith Ltd, Markham Charles Barns Limited, Mulini Exhibition Displays & Services Limited, P K & M Grummitt, Stancer Brothers Limited, Timothy Boor, N. M. Boor and Sons, Walter David Branton**) – The Applicant is engaged with the freehold owner to secure the necessary land or rights required for the scheme. The Applicant has asked for clarification on the basis of occupation and tenancy of those listed in Category 1 of the Land Rights Tracker (Doc Ref. 4.4 Rev 3) to the freehold owner and their agent(s) there has been no response as of Deadline 3.

ExQ1	Question to:	Question:
		The Applicant will seek engagement with Occupiers or Tenants where it has been confirmed to the Applicant that there is an Occupier or Tenant in possession of the land. In these instances we remain engaged with the Freehold owner and are seeking clarification on any occupiers and tenants so we can understand if we need to seek the necessary rights from those Occupiers or Tenants. Once known to the Applicant, these Occupiers or Tenants will be kept up to date as the scheme progresses. No proposed permanent Infrastructure (**Andrea Jane Rhodes, Stephen Frank Rhodes, Beryl Holden, Tony Holden, Cameron Robert Whitworth, Jutta Whitworth-Biehler, Carole Ann Yule, John Andrew Yule, Catherine Mary Pease, Susan Elizabeth Shaw, Clive Stewart Harvey, Tamra Louise Gadd, Frances Mary Glendinning, Neil John Elisha, Jason Charles Thame, Jean Mary Cottam, Victor Ronald Cottam, James R Gemmell, R L Stevenson, Mary Rosalind Bull, Vincent Arthur James Bull, John Albert Gibson, Michael Peter Truluck, Normon Grundy & Son Limited, Robin Hancox, Tessa Jane Hancox, The Executor for the Estate of Jonathan Henry Dean (Jonathan Henry Dean), The Official Custodian For Charities, Trevor John Tyrrell**) - The Applicant has followed up with these affected parties to inform them of the impact the Scheme will have on their land. Discussions remain ongoing as the Applicant looks to provide updates as the Scheme develops and examination progresses. Currently, the land owned by the affected parties listed has no permanent infrastructure proposed and may be required by the Scheme for flexibility (i.e. forming part of the LoD) and/or to support temporary infrastructure such as construction access, third party access, etc and is subject to detailed design.
Q6.0.30	The applicant	**Schedule of Changes to Book of Reference** In respect of amendments made to the BoR [REP1-095], where the change is stated as being "The Applicant has removed the compulsory acquisition sought over this plot", please provide further explanation for the removal of CA powers previously sought.

ExQ1	Question to:	Question:
		The Applicant has set out below the reason for the removal of compulsory acquisition powers over specific plots; • A1-1 and A1-2; Ongoing discussions with the Environment Agency ("EA") identified concerns around the acquisition sought as the land comprised of a land drainage ditch/bank which formed part of the adjacent statutory Crowland and Cowbit Washes Flood Storage Reservoir. These discussions identified the EA's concern regarding how this would impact their access for maintenance purposes. Further review of the land requirements for these plots and the design resulted in the Applicant removing compulsory acquisition. • A6-1; The Applicant's intention is to work and remain within the highway (identified as A5-2), as such A6-1 was not required following further review of OS master mapping and HM Land Registry which highlighted a discrepancy meaning plot A6-1 is within private ownership and was not required. • A8-2; The Applicant's intention is to work and remain within the highway (identified as A8-9), as such A8-2 was not required following further review. • A9-39; The land requirement for this plot related to mitigation which cut the corner of work No. 7. Through ongoing engagement with the affected party and further review of the land requirements, the Applicant can confirm this was the result of boundary errors and could remove the compulsory acquisition sort as this did not form part of any key infrastructure for the scheme. • A11-10; The land comprises of a land drainage which falls adjacent to the solar site, further review of the land requirements required for plot A11-10 confirmed no works are proposed over this plot and as such the Applicant has removed the powers sought. • B4-24; This land formed part of the works associated with overhead line works and associated infrastructure (work no.13), following concerns highlighted by the landowner around their property and the proximity of our works. The Applicant reviewed the requirement for B4-24 and

ExQ1	Question to:	Question:
		confirmed this land formed part of the limits of deviation associated with the overhead line and could be removed without negatively impacting the proposed scheme. Overall, all changes which resulted in the Applicant removing compulsory acquisition from the plots listed above, as seen in Schedule of Changes to Book of Reference (Doc Ref. 8.25 Rev 2) and reflected in the Book of Reference (Doc Ref. 4.3 Rev 3) reflects the Applicant's updated position following further review of the land requirements and engagement with the affected land interests.

Statutory Undertakers

2.6.2. The below table sets out the Applicant's response to the ExA's written questions relating to Statutory Undertakers.

Table 2.6-1

Table 2.6-2: Statutory Undertakers

ExQ1	Question to:	Question:
Q6.1.1	All Statutory Undertakers	**Planning Act 2008** Please set out your position with regards to the tests under s127 and s138 of the Planning Act 2008 (PA2008) as applicable to your respective interests.
Q6.1.2	The applicant	**Planning Act 2008** For each statutory undertaker that may be affected by the proposed CA powers, please specify whether s127 and/ or s138 of the PA2008 is engaged in each case, and provide evidence to demonstrate how the relevant statutory test is satisfied.
		Section 127 of the PA 2008 states that compulsory acquisition powers can only be granted over statutory undertaker's land (which the Applicant notes does not include telecommunications

ExQ1	Question to:	Question:
		companies), where an objection has been submitted by the relevant statutory undertaker, where the Secretary of State is satisfied that there would be no serious detriment to the statutory undertaking arising from that compulsory acquisition. Section 138 of the PA 2008 applies in respect of land proposed to be compulsorily acquired on which statutory undertakers' apparatus, or rights relating to such apparatus, exists. It provides that a DCO can only include provisions for removal of apparatus or extinguishment of a relevant right if the Secretary of State is satisfied that the extinguishment or removal is necessary for the purpose of carrying out the development to which the DCO relates. The position in respect of each statutory undertaker which may be affected by the Scheme is set out below: • **Anglian Water Services Limited, Cadent Gas Limited, Environment Agency, National Grid Electricity Distribution (East Midlands) plc, National Grid Electricity Transmission plc, Spalding Energy Company Limited, Spalding Energy Expansion Limited:** sections 127 and 138 are engaged but the Applicant considers that the DCO can secure adequate protections for these statutory undertakers such that no serious detriment will arise. Schedule 13 of the **Draft DCO** (Doc Ref. 3.1 Rev 3) currently includes protective provisions for the benefit of Anglian Water Services (Part 4), the Environment Agency (Part 6), National Grid Electricity Distribution (East Midlands) plc (Part 5) and National Grid Electricity Transmission plc (Part 7). The protective provisions benefitting Anglian Water Services Limited and National Grid Electricity Distribution (East Midlands) plc are agreed. The Applicant is in active negotiation with the remaining statutory undertakers to agree the protective provisions. The Applicant is also in active discussion with Cadent Gas Limited, Spalding Energy Company Limited and Spalding Energy Expansion Limited regarding the inclusion of bespoke protective provisions within the DCO. • **BT Group plc:** section 127 is not engaged as BT is not a statutory undertaker for the purposes of that section. Section 138 is engaged as BT holds relevant rights in accordance with the

ExQ1	Question to:	Question:
		electronic communications code in respect of removal and/or replacement of their apparatus within the Site. Protective provisions are included within Part 2 of Schedule 13 of the draft DCO for the benefit of operators of electronic communications code networks, and no request has been made by BT for bespoke protective provisions. • **South Holland Internal Drainage Board and North Level District Internal Drainage Board:** while the Scheme falls within their respective areas of responsibility, sections 127 and 138 are not engaged as these IDBs are not statutory undertakers as defined in those sections. However, the Applicant has included protective provisions for the benefit of drainage authorities at Part 3 of Schedule 13 of the draft DCO. These protective provisions provide appropriate controls in respect of the drainage interests held by these IDBs. The Applicant is in active discussions with South Holland IDB to accommodate its specific requirements within the protective provisions, but has not yet received feedback from the North Level District IDB. **Network Rail Infrastructure Limited:** the Applicant does not consider section 127 to be engaged as there is no Network Rail operational land within the Order Limits. The Applicant is engaging with Network Rail to understand the extent to which section 138 is engaged in relation to historic rights of Network Rail over parts of the Order Land. In that context, the Applicant is also engaging with Network Rail to understand the extent to which protective provisions for Network Rail's benefit may be required.
Q6.1.3	National Grid Electricity Transmission	**Restriction of Compulsory Acquisition powers** Please provide further detailed justification for the need to restrict CA powers in respect of land required for future projects that is not currently within NGET's ownership. Explain why additional restrictions are considered necessary in respect of the proposed development.

ExQ1	Question to:	Question:
Q6.1.4	The applicant	**Spalding Energy Company Limited (InterGen)** Noting the concerns raised by Spalding Energy Company Limited (InterGen) in its relevant representation (RR) [RR-184], when does the applicant propose to undertake the detailed interference studies required to assess potential effects on existing infrastructure? In the absence of these studies, on what basis can the applicant conclude whether alternating current interference would, or would not, be experienced.
		As outlined in **Relevant Representations Report** [REP1-074], Section 3.13, at this stage of the Project, no detailed interference studies have been carried out. The route of the overhead line and pylon positions are subject detailed design, including confirmation of the final NGET Weston Marsh B substation location, and proposed new and modified overhead lines in the area. The Meridian OHL and pylons are also subject to limits of deviation should they remain in their current location. Therefore, future Alternating Current (AC) studies will be conducted to determine whether there will be any impacts on the InterGen pipeline, coupled with obtaining more information about the condition of the pipeline, its material, coating, and whether any AC mitigation already exists. As noted above, any necessary approvals in respect of impacts on its asset will be sought from InterGen at the point of detailed design in accordance with the protective provisions being negotiated between the parties.

Individual Affected Persons

2.6.3. The below table sets out the Applicant's response to the ExA's written questions relating to Individual Affected Persons.

Table 2.6-3: Individual Affected Persons

ExQ1	Question to:	Question:
Q6.2.1	The applicant	**Andrew Martin King, Elizabeth Mary McRoberts, Frederick David King**

ExQ1	Question to:	Question:
		It is noted that the APs stated they did not wish to engage with the Heads of Terms or matters related to the proposed development in June 2026. Please confirm whether the applicant has made any further attempts to engage with the APs since June 2026? If no further communication has taken place, please explain what steps, if any, the applicant intends to take to attempt to progress discussions.
		The Applicant has issued a letter addressed to Andrew Martin King (the point of contact for the land holding of Andrew Martin King, Elizabeth Mary McRoberts, Frederick David King) on 21 September 2026 to confirm if the land holdings position had changed and they were now willing to engage. There has been no response as of Deadline 3. The Applicant remains committed to seeking voluntary agreement and will make further attempts throughout examination to engage with the affected person(s) to discuss the scheme, their land and the land rights being sought by the Applicant. An updated **Land Rights Tracker** (Doc Ref. 4.4 Rev 3) has been provided at Deadline 3 which provides the latest summary of the negotiations undertaken to date and the current status where the Applicant is seeking the necessary land rights by voluntary agreement.
Q6.2.2	The applicant	**Carlton James Lane** Has the requested information in respect of route design methodology and clarification on the applicant's interaction with other potential developments in the area been provided to the AP? If not, please provide justification.
		The Applicant remains open to ongoing engagement with Carlton James Lane to progress voluntary agreement. However, the information requested in respect of route design and methodology remains subject to ongoing discussions with NGET around the presence of both schemes in Mr Lane's land ownership. As such the Applicant is not yet in a position to provide this, but will do so at the earliest opportunity.

Crown Land and Special Category Land

2.6.4. The below table sets out the Applicant's response to the ExA's written questions relating to Crown Land and Special Category Land.

Table 2.6-4: Crown Land and Special Category Land

ExQ1	Question to:	Question:
Q6.3.1	Lincolnshire County Council South Holland District Council	**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.
Q6.3.2	The applicant	**Plot A11-10** Please confirm why CA is no longer sought over plot A11-10.
		See response above (Q6.0.30).
Q6.3.3	The applicant	**Crown Land** The update to the LRT [REP1-012] in respect of Crown Land is noted. How confident is the applicant that both the Heads of Terms and Option Agreement will be completed by the end of the examination? Please provide details of any matters which may affect the anticipated timescale.
		The Applicant has continued to engage with the Crown regarding their interest and the necessary rights required over plot A12-9. The Crown has not been able to confirm to the Applicant whether its minerals interests extend ad medium filum into the centre line of the highway. While the Applicant has assumed they do, on a precautionary basis, it has further considered the nature and extent of the proposed Scheme works within Plot A12-9. These works are limited to alteration of layout to the highway, specifically to enable areas of road widening in order to

ExQ1	Question to:	Question:
		accommodate Scheme traffic. These works are not proposed to expand into the adjacent Crown Estate plot, or extend to a depth beneath the existing highway surface, such as to interfere with any latent minerals rights beneath. As such, the Applicant does not consider it would interfere with such rights, even if they do exist. On this basis, the Applicant has removed any powers to enable the compulsory acquisition of Crown rights within Plot A12-9 from the **Book of Reference** (Doc Ref. 4.3 Rev 3) and the updated **Land Rights Tracker** (Doc Ref. 4.4 Rev 3). This accordingly removes the requirement to obtain Crown consent, and the applicant is no longer pursuing any such consent with the Crown.

2.7. The Draft Development Consent Order

General

2.7.1. The below table sets out the Applicant's response to the ExA's written questions relating to general dDCO matters.

Table 2.7-1: General

ExQ1	Question to:	Question:
Q7.0.1	The applicant	**Timescales** References to timescale throughout the dDCO [REP1-006] are expressed in both weeks and days. Please clarify the rationale for adopting weeks as a relevant unit of time. Also, please confirm whether a 'week' is intended to mean a working week or a period of seven consecutive days, and identify where this is defined within the dDCO.
		The **Draft DCO** (Doc Ref. 3.1 Rev 3) uses both weeks and days depending on the nature of the relevant provision, with weeks generally used for longer procedural periods and days used where greater precision is required. The term "week" is intended to mean a period of seven consecutive days, not a working week. Where the dDCO intends a period to be measured by reference to working days, it does so expressly through the defined term "working day" in article 2(1). The Applicant notes that this approach is consistent with other recent solar DCOs, including Green Hill Solar Farm Order 2026, Fenwick Solar Farm Order 2026, Springwell Solar Farm Order 2026, and Tillbridge Solar Order 2025, none of which define the term "week". Accordingly, the Applicant does not consider a separate definition of "week" to be necessary.
Q7.0.2	The applicant	**Temporary possession of land** Please explain why the dDCO [REP1-006] does not include a schedule identifying the land in respect of which temporary possession may be taken.

ExQ1	Question to:	Question:
		The **Draft DCO** [REP1-006] as submitted did not include a separate schedule identifying land subject to temporary possession because the relevant plots are already identified in the Book of Reference and on the Land Plans. Article 31 provides the power to take temporary possession and cross-refers to the land in respect of which those powers may be exercised. The approach of referring out to the Book of Reference to identify plots in respect of specific powers was based on the drafting within recent National Grid Electricity Transmission (NGET) DCOs, including the made Sealink DCO and the draft Norwich to Tilbury DCO, which is at recommendation stage. However, in response to the ExA's question and in the interests of clarity, the Applicant has amended the Draft DCO to include a standalone schedule which identifies, within the Draft DCO directly (as opposed to by reference to the book of reference) the respective compulsory acquisition powers and rights (including temporary possession rights) which apply to the respective plots of land within the Scheme. As well as providing clarity directly within the Draft DCO on the plots to which each compulsory acquisition power relates under the Order, this amendment also addresses the questions raised by the Examining Authority at Q7.0.6 (regarding a schedule identifying plots to which rights may be granted) and Q6.0.16 (seeking greater clarity or commitment as to the scope and content of rights to be obtained). While the Applicant continues to consider its original approach appropriately identified those plots which benefited from temporary possession powers and other compulsory acquisition powers, by reference to the Book of Reference and Land Plans, the amendments ensure these are fully encapsulated within the DCO to ensure they can be clearly applied post consent.
Q7.0.3	The applicant	**Order Limits definition** Please explain why the definition of 'OL' does not expressly include land identified on the Land Plans [REP1-004] and [REP1-005].
		The definition of Order Limits refers to the limits of the land to be acquired or used for the authorised development shown on the **Works Plans** [APP-009 and APP-010]. The Applicant notes that this

ExQ1	Question to:	Question:
		approach is consistent with other recent solar DCOs, including Green Hill Solar Farm Order 2026, Springwell Solar Farm Order 2026, and Tillbridge Solar Order 2025, which similarly define the Order Limits by reference to the Works Plans rather than the Land Plans. The Applicant confirms that the spatial extent of the Order Limits shown on the Works Plans [APP-009 and APP-010] is consistent with the Order Limits shown on the **Land Plans** [REP1-004 and REP1-005]. The Land Plans provide additional land referencing information, including plot boundaries and plot numbers, but do not alter the extent of the Order Limits. Accordingly, the Applicant considers the existing definition to be clear and appropriate.
Q7.0.4	The applicant	**Limits of Deviation: Cable Sealing End Compounds** Please explain why LoD for the CSEC (Work Nos. 10, 12 and 14 and as shown on Figure 2-7: Grid Connection Route Illustrative Construction Layout Plan (sheet 7 of 9) [APP-079] and referred to at paragraph 2.8.6 of ES Chapter 2 [AS-017]) are not included within article 2 "Interpretation" 'limits of deviation'.
		Work Nos. 10 and 12 comprise non-linear works within Section B: Grid Connection and are therefore subject to the limits of deviation shown on the Works Plans as "Limits of Deviation: Non-Linear Works", as referred to in limb (e) of the definition of "limits of deviation" in article 2. Work No. 14 comprises a combination of overhead line works, underground cable works and associated non-linear works. The applicable limits of deviation for those elements are shown on the Works Plans and are captured by limbs (c), (d) and (e) of the definition of "limits of deviation", as applicable. The Applicant therefore considers that the limits of deviation applicable to the cable sealing end compounds are already provided for within the definition of "limits of deviation" and that no amendment to article 2 is required.

ExQ1	Question to:	Question:
Q7.0.5	The applicant	**Construction parameters** Please explain why the construction parameters are not detailed within the dDCO [REP1-006] and instead appear to be contained only within the Design Parameters document [REP1-055].
		The Applicant does not agree with the premise of the question that construction parameters are contained solely within the **Design Parameters** document [REP1-055]. The **Design Parameters** document [REP1-055], secured through Requirement 5, relates to the permanent operational infrastructure comprising the Scheme and sets the design parameters within which that infrastructure must be delivered. Temporary construction activities and construction-related measures are instead controlled through the **Outline Construction Environmental Management Plan**, secured by Requirement 12 of the Draft DCO, and the Works Plans [APP-009 and APP-010]. The Applicant considers that this approach is appropriate as it secures permanent operational design parameters and construction controls through the most relevant documents within the DCO framework, whilst retaining appropriate flexibility for detailed design and construction methodology. This approach is also consistent with a number of recently made solar DCOs, including the Green Hill Solar Farm Order 2026, Fenwick Solar Farm Order 2026, Springwell Solar Farm Order 2026 and Tillbridge Solar Order 2025, which similarly secure design and construction parameters through certified documents and associated requirements rather than repeating those parameters within the DCO itself.
Q7.0.6	The applicant	**Schedule query** Is it necessary for the dDCO [REP1-006] to contain a schedule which details 'Land in which only new rights etc. may be acquired'? If not, please provide justification.

ExQ1	Question to:	Question:
		As noted in response to Q7.0.2 above, the **Draft DCO** (Doc Ref. 3.1 Rev 3) has been updated at Deadline 3 to include a new Schedule 9 (compulsory acquisition of land and rights and temporary possession of land), providing additional clarity regarding the land affected by the powers sought under the Order.
Q7.0.7	The applicant	**Time period referencing** Please review references to time periods throughout the dDCO [REP1-006] and ensure their consistency. For example, 'one week' is presented as '1 week', whereas 'two weeks' is written in words.
		This has been corrected in the **Draft DCO** (Doc Ref. 3.1 Rev 3) submitted at Deadline 3.
Q7.0.8	The applicant	**Timescales** The ExA notes that the time period prescribed in schedule 14 (procedure for discharge of requirements) is shorter than those provided for in many other made DCOs. It is also noted that other time periods within the dDCO [REP1-006] have been reduced. As an example, article 31(3) specifies a period of two weeks, rather than the more common 28 days. Please review all time periods within the dDCO and provide a justification for the duration, particularly where they differ from the periods usually adopted in other made DCOs.
		In relation to the time periods for the discharge of requirements procedure (schedule 14), the Applicant refers the ExA to its response to LCC's comments on Schedule 14 in the **Applicant's Comments on Deadline 2 Submissions** (Document Ref. 8.38), table 2-2, row 3.7. The Applicant has undertaken a review of the remaining time periods contained in the draft DCO against recently made solar DCOs, including Green Hill Solar Farm, Fenwick Solar Farm, One Earth Solar Farm, Springwell Solar Farm and Tillbridge Solar Farm. Following that review, the Applicant has amended the Draft DCO to:

<table>
<tr><th>ExQ1</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td></td><td>

increase the notice period for temporary possession under article 31(3) from 14 days to 28 days;
increase the deemed approval period for non-requirement consents under article 47(4) from six weeks to eight weeks; and
include a 14-day period for the agreement of an arbitrator, following recent precedent DCO drafting.

The Applicant has retained the remaining time periods where these are either:

consistent with recent precedent;
broadly equivalent to periods adopted in recent precedent; or
justified by Scheme-specific circumstances.

In particular, the seven-year commencement and compulsory acquisition periods are retained to reflect the uncertainty associated with the grid connection programme and the need for a corresponding implementation period, as further explained in the Applicant's response to ExQ1 Q7.3.3.

The review considered all time periods within the Draft DCO. The table below summarises those provisions where the relevant time period differs from, or otherwise warrants explanation by reference to, the Green Hill Solar Farm, Fenwick Solar Farm, One Earth Solar Farm, Springwell Solar Farm or Tillbridge Solar Farm DCOs. The remaining time periods were found to be materially consistent with those comparator DCOs.

<table>
<tr><th>Provision</th><th>Existing Position</th><th>Justification / Outcome</th></tr>
</table>
</td></tr>
</table>

ExQ1	Question to:	Question:

Compulsory acquisition period (article 22(1))	7 years	Retained. Aligns with the seven-year commencement period and reflects uncertainty regarding the grid connection programme and resulting implementation period.
Commencement period (schedule 2, requirement 2)	7 years	Retained for the same reason.
Temporary possession notice (article 31(3)	14 days	Amended to 28 days to align with the approach adopted in Green Hill Solar Farm, Fenwick Solar Farm, One Earth Solar Farm and Springwell Solar Farm DCOs.
Traffic regulation notice period (article 17(5))	5 working days	Retained. Consistent with the Fenwick Solar Farm DCO and broadly equivalent to the seven-calendar-day period adopted in the Green Hill Solar Farm, One Earth Solar Farm, Springwell Solar Farm and Tillbridge Solar Farm DCOs.
Transfer/grant of benefit effective date (article 37(6))	10 working days	Retained. Consistent with the Green Hill Solar Farm and Tillbridge Solar Farm DCOs.
Deemed approval period (article 47(4))	6 weeks	Amended to 8 weeks to align with Fenwick Solar Farm and Tillbridge Solar Farm DCOs.
Final commissioning notice (schedule 2, requirement 3(4))	10 working days	Retained. Consistent with the Fenwick Solar Farm DCO and broadly comparable to the 14-calendar-day period adopted in the Green Hill Solar Farm DCO.
Decommissioning deadline (schedule	40 years	Retained. Reflects the assessed operational lifetime of the Scheme.

<table>
<tr><th>ExQ1</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>2, requirement 21(2))</td><td></td><td></td></tr>
<tr><td>Submission of decommissioning plan (schedule 2, requirement 21(1))</td><td>12 months before decommissioning</td><td>Retained. Consistent with the Fenwick Solar Farm DCO and provides a longer period for review than the Green Hill Solar Farm, One Earth Solar Farm, Springwell Solar Farm and Tillbridge Solar Farm DCOs.</td></tr>
<tr><td>Appointment of arbitrator (article 44)</td><td>No prescribed period</td><td>Amended to include a 14-day period, consistent with Fenwick Solar Farm, One Earth Solar Farm and Tillbridge Solar Farm DCOs.</td></tr>
</table>
</td></tr>
<tr><td rowspan="2">Q7.0.9</td><td rowspan="2">The applicant</td><td>Legal entities

Please undertake a review of the dDCO [REP1-006] to ensure all legal entities are referred to correctly throughout. Examples include, but are not limited to, whether 'Anglian Water' should be 'Anglian Water Services' and whether 'National Highways' should be 'National Highways Limited'. Please make any necessary amendments.</td></tr>
<tr><td>The Applicant has reviewed the legal entities referred to throughout the Draft DCO.

Requirement 10 has been amended at Deadline 3 to refer to Anglian Water Services Limited. The remaining references to "Anglian Water" are contained in Part 4 of Schedule 14, where that term is expressly defined as Anglian Water Services Limited, and no further amendment is therefore required in that respect.

The Applicant has also amended the article 2 definitions relating to National Grid Electricity Distribution (East Midlands) plc and National Grid Electricity Transmission plc to ensure that the correct legal names and company numbers are used.

The only reference to National Highways Limited already uses its full legal name. The Applicant has reviewed the other entities referred to in the draft DCO and does not consider any further amendments to be necessary.</td></tr>
</table>

Parts 1 to 6 – Articles

2.7.2. The below table sets out the Applicant's response to the ExA's written questions relating to Parts 1 to 6 – Articles.

Table 2.7-2: Parts 1 to 6 – Articles

ExQ1	Question to:	Question:
Q7.1.1	The applicant	**Part 1 Article 2 (Interpretation)** The ExA notes article 2(6) reads "heights and depths in this Order or on the works plans are measured from the proposed final ground level, any limits of vertical deviation and maximum parameters applicable to the authorised development are governed by the design parameters". In the interests of certainty, how is the 'proposed final ground level' known and where within the submitted application documentation is that term specifically defined?
		The term "proposed final ground level" is not separately defined within the application documents and is intended to refer to the final ground level following completion of the authorised development, rather than existing ground levels. The Applicant does not consider that the term gives rise to uncertainty. However, if the ExA considers that the use of the word "proposed" creates uncertainty, the Applicant would be content to amend article 2(6) to refer simply to "final ground level".
Q7.1.2	The applicant	**Part 1 Article 2 (Interpretation)** Please confirm why there is no definition within article 2 of 'special category land' or 'special category land plans'? Please review and amend if necessary.
		The Applicant does not consider it necessary to define "special category land" in article 2. The term derives from the statutory framework established by the Planning Act 2008 and is commonly used in DCOs without a bespoke definition. By way of example, both the A46 Newark Bypass Development Consent Order 2025 and the A57 Link Roads Development Consent Order 2022

ExQ1	Question to:	Question:
		include Special Category Land Plans but do not define "special category land" in their interpretation provisions. The **Draft DCO** (Doc Ref. 3.1 Rev 3) has been amended at Deadline 3 to include a definition of "Special Category Land Plans" by reference to the certified plans listed in Schedule 11.
Q7.1.3	The applicant	**Part 2 Article 8 (Defence to proceedings in respect of statutory nuisance)** Should the following text be included at the end of article 8(1)(a) 'or any document approved under the provisions of schedule 2 (requirements) of this Order; or'? If not, please provide a justification.
		The Applicant agrees that this additional wording would assist clarity. Accordingly, the **Draft DCO** (Doc Ref. 3.1 Rev 3) has been updated at Deadline 3.
Q7.1.4	The applicant	**Part 3 Article 10 (Application of the permit scheme)** LCC Local Impact Report (LIR) [REP1-006] has outlined that the current wording of article 10 would create a presumption that a permit would be granted and that it does not adequately protect the Highway Authority's network management and coordination functions. LCC have advanced further wording they wish to see added to article 10. What is the applicant's reply to these matters?
		The Applicant's response to LCC's comments on article 10 is set out in the **Applicant's Comments on Local Impact Reports** [REP2-015], table 3.16, row 16.3.
Q7.1.5	Lincolnshire County Council	**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.
Q7.1.6	The applicant	**Part 3 Article 11 (Power to alter layout, etc., of streets)**

ExQ1	Question to:	Question:
		Please signpost to where within the application documents an explanation is provided detailing why the power to alter the layout of streets specified in column 2 of the table at schedule 5 permanently, is necessary.
		The need for the permanent alterations to the streets identified in Schedule 5 arises from the proposed access arrangements and associated highway works required for the authorised development. Details of the proposed access arrangements are contained in the **Outline Construction Traffic Management Plan**, Annex B (Doc Ref. 7.13 Rev 1) which identifies the locations and nature of the highway works required to facilitate construction and operation of the Scheme. These works include the formation of permanent site accesses, associated carriageway tie-in works, visibility improvements and cable crossings beneath the highway network. The streets listed in Schedule 5 are those where such permanent alterations may be required in connection with these works.
Q7.1.7	The applicant	**Part 3 Article 13 (Temporary closure, restriction or prohibition of use of streets and public rights of way)** Article 13(1)(b) authorises the applicant to allow the use of public rights of way by motor vehicles. • Why is this power necessary? • Is there a list of such paths where this is anticipated and have those paths been assessed as to their suitability to take motor vehicles? • Where in the dDCO [REP1-006] is the restoration and reinstatement of these paths, if necessary, secured?

ExQ1	Question to:	Question:
		The power in article 13(1)(b) is included to provide flexibility where it is necessary, in connection with the authorised development, to permit the use of a public right of way by motor vehicles during periods of temporary closure, restriction or diversion. Article 13(1)(b) may be exercised in relation to any public right of way within the Order Limits. However, article 13(4) distinguishes between: • the public rights of way identified in Part 3 of Schedule 6, in respect of which the power may be exercised following consultation with the highway authority; and • any other public right of way, in respect of which the consent of the highway authority would first be required under article 13(4)(b). The public rights of way identified in Part 3 of Schedule 6 to the **Draft DCO** (Doc Ref. 3.1 Rev 3) are shown on the **Streets, Rights of Way and Access Plans** [APP-014 and APP-015]. In practice, the Applicant does not anticipate construction vehicles travelling along public rights of way. Rather, where interaction with a public right of way is required, this is expected to comprise construction vehicles crossing the route at identified crossing points. Temporary closures may be required during the establishment of such crossing points, following which the relevant public right of way would be reopened, with appropriate management measures in place. The routes identified in Part 3 of Schedule 6 have been included in full to ensure appropriate flexibility for the crossing locations where the temporary authorisation of motor vehicles may be required. Current indicative designs for internal site access tracks are subject to change, and therefore exact locations for crossings are not committed to. The Applicant has assessed the locations where public rights of way interact with the authorised development and is satisfied that the proposed crossings can be delivered safely. Restoration and reinstatement are secured through article 13(7), which requires any street or public right of way used as a temporary working site to be restored to the reasonable satisfaction of the

ExQ1	Question to:	Question:
		street authority. In addition, the **Outline Public Rights of Way Management Plan** (Doc Ref. 7.15 Rev 2), has been updated for Deadline 3 to include the commitment that: *Any PRoW affected by the Scheme shall be reinstated to a condition no less favourable than that which existed prior to the commencement of the relevant works, unless otherwise agreed with LCC.*
Q7.1.8	The applicant	**Part 3 Article 13 (Temporary closure, restriction or prohibition of use of streets and public rights of way)** Article 13(2) gives access for pedestrian to premises. • What about pedestrians with vehicles needing to access premises or houses? • If vehicles are temporarily unable to access premises, how will this displacement be managed, including any displaced parking in the area? • Article 13 does not detail that any temporary alteration made to streets must be maintained by and at the expense of the undertakers for the duration of any temporary alterations. Article 13 also does not confirm that any restoration works carried out pursuant to article 11 (Power to alter layout, etc., of streets) must be completed to the reasonable satisfaction of the highway authority or street authority and maintenance time period is not detailed. Please confirm whether such wording is considered necessary. If not, provide justification.
		Pedestrian access Article 13(2) requires the undertaker to provide reasonable access for pedestrians to and from premises where such access would otherwise be unavailable as a result of the temporary closure, restriction, alteration or diversion of a street or public right of way. This commitment is an appropriate safeguard to ensure residents and businesses are able to enter their properties at all times, and is drafted in line with similar drafting adopted in a number of recent solar DCOs (see "Precedent" section of this response below).

ExQ1	Question to:	Question:
		Vehicular access and displaced parking The Applicant acknowledges that the temporary exercise of powers under article 13 could, in certain circumstances, affect vehicular access to premises. While this may result in impacts to residents and local businesses, the Applicant cannot guarantee full access can be maintained at all times (for example when road widening or road resurfacing works are being undertaken). However, the need for any temporary restrictions on vehicular access, and any associated traffic management measures, would be considered and managed through the detailed Construction Traffic Management Plan. The **Outline CTMP** (Doc ref. 7.13 Rev 1) states that where full road closures are required, consideration will be given to the continued access of local residents and commercial businesses within the area of the closure and that the details, mitigation and management measures associated with temporary closures will be agreed with LCC and secured through the detailed CTMP (paragraphs 7.2.5 and 7.2.7). These may include matters such as working hours (eg, night works, so as to minimise impacts on access during usual business hours), or provision of mitigation like alternative parking arrangements for residents or businesses that cannot park within their properties or in usual on-street parking. As a final backstop to such mitigation measures, article 13(5) provides that any person who suffers loss by the suspension of any street or private right of way under article 13 is entitled to compensation, to be determined in accordance with Part 1 of the Land Compensation Act 1961. **Maintenance and restoration of streets and public rights of way** The Applicant does not consider that additional maintenance provisions are required within article 13. Article 13 is concerned with the temporary closure, restriction, diversion and management of streets and public rights of way during the construction, maintenance and decommissioning of the

ExQ1	Question to:	Question:
		authorised development. Where a street or public right of way is used as a temporary working site, article 13(7) already requires the undertaker to restore the street or public right of way to the reasonable satisfaction of the street authority. The Applicant also does not consider that further provisions are required in relation to restoration works carried out pursuant to article 11. Article 11(3) already provides that any street temporarily altered under article 11 must be restored to the reasonable satisfaction of the street authority. In addition, article 12(1)(a) requires streets altered under article 11 to be completed to the reasonable satisfaction of the street authority. **Maintenance period for streets altered under article 11** Article 12(1)(b) further provides that, unless otherwise agreed with the street authority, streets altered under article 11 must be maintained by and at the expense of the undertaker for a period of 12 months following completion, after which responsibility transfers to the street authority. The Applicant therefore considers that appropriate provisions regarding access, restoration, completion, maintenance and the role of the street authority are already secured through articles 11, 12 and 13, and that no amendment to article 13 is required. **Precedent** The Applicant notes that articles 11, 12 and 13 operate in a substantially similar manner to the equivalent provisions in the Tillbridge Solar Order 2025, Fenwick Solar Project Order 2026 and Green Hill Solar Farm Order 2026. The Applicant is not aware of any requirement in those orders for additional provisions of the type suggested, and considers the drafting proposed in the **Draft DCO** (Doc Ref. 3.1 Rev 3) to be both appropriate and well precedented.
Q7.1.9	The applicant	**Part 3 Article 17 (Traffic regulation measures)**

ExQ1	Question to:	Question:
	Lincolnshire County Council	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.
		Article 17 enables the undertaker to make temporary traffic regulation measures where necessary for the construction, maintenance or decommissioning of the Scheme. While article 17(1) refers to "any road", the power is constrained by the procedural safeguards in the article, including the requirements to consult with the chief officer of police, obtain the written consent of the relevant traffic authority and provide advance notice before any measure is implemented. The drafting reflects the fact that traffic regulation measures may be required both within and beyond the Order limits, for example on roads forming part of construction traffic routes or affected by construction activities associated with the Scheme. It would not be practicable to identify all such measures in advance. The Applicant therefore considers the scope of the power to be appropriate and proportionate, having regard to the temporary nature of the measures and the requirement for traffic authority consent before the power can be exercised. The power is consistent with section 120(5)(a) of the Planning Act 2008 and is commonly included in DCOs for nationally significant infrastructure projects where temporary traffic regulation measures may be required in the interests of public safety during construction. Comparable provisions are included in, amongst others, the Great Yarmouth Third River Crossing Development Consent Order 2020, the Cottam Solar Project Order 2024, the West Burton Solar Project Order 2025 and the Tillbridge Solar Order 2025, the One Earth Solar Farm Order 2026 and the Green Hill Solar Farm Order 2026.
Q7.1.10		**Part 3 Article 17 (Traffic regulation measures)**

ExQ1	Question to:	Question:
	Lincolnshire County Council	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.
Q7.1.11	The applicant	**Part 4 Article 20 (Authority to survey and investigate the land)** Article 20(2) requires the undertaker to give two weeks' notice before the removal of any equipment that has been left on land. Please confirm whether there is a prescribed time limit for the removal of such equipment from the land? If not, what safeguards are there to prevent the equipment being left on the land indefinitely? Please review and consider whether wording requiring equipment to be removed as soon as reasonably practicable following the completion of the relevant activities is necessary. If not, please justify.
		The Applicant does not consider that additional drafting is necessary. Article 20 is a standard provision which permits the undertaker to enter land temporarily for the purposes of carrying out surveys and investigations in connection with the authorised development. The power to place and leave equipment on land under article 20(1)(d) is expressly limited to equipment required for those survey and investigation activities and does not authorise equipment to be left on land indefinitely. Whilst article 20 does not prescribe a specific period within which equipment must be removed, the Applicant considers that adequate safeguards are already provided. In particular: • the power may only be exercised for the purposes set out in article 20; • at least two weeks' notice must be provided before equipment is placed on, left on or removed from the land;

ExQ1	Question to:	Question:
		• the undertaker is liable to compensate owners and occupiers for any loss or damage arising from the exercise of the power; and • the landowner retains the ability to pursue any dispute regarding compensation through the statutory compensation code. The Applicant therefore considers that there is no reasonable prospect of equipment being left on land indefinitely and that the existing drafting strikes an appropriate balance between facilitating necessary surveys and protecting landowners' interests. The drafting reflects the equivalent provisions contained in recently made development consent orders, including the Green Hill Solar Farm Order 2026, the One Earth Solar Farm Order 2026 and the Tillbridge Solar Order 2025, none of which include an express requirement for equipment to be removed "as soon as reasonably practicable" following completion of the relevant activities. Accordingly, the Applicant does not consider any amendment to article 20 is required.
Q7.1.12	The applicant	**Part 5 Article 21 (Compulsory acquisition of land)** In respect of article 21(1)(a) please signpost to the definition of the term 'incidental' or alternatively, provide a definition. Please also explain how the acquisition of land for incidental purposes would satisfy the relevant policy tests for compulsory acquisition.
		The Applicant does not consider that a bespoke definition of "incidental" is required. The wording of article 21(1)(a) reflects section 122(2)(b) of the Planning Act 2008, which permits compulsory acquisition of land that is required to facilitate, or is incidental to, the development to which the DCO relates. As the term is used in, and derives directly from, the statutory test in section 122 of the Planning Act 2008, the Applicant does not consider that it is necessary or appropriate to provide a separate definition in the **Draft DCO** (Doc Ref. 3.1 Rev 3).

ExQ1	Question to:	Question:
		The inclusion of the term does not disapply or dilute the statutory tests for compulsory acquisition. The Applicant must demonstrate that all land proposed to be acquired compulsorily satisfies the requirements of section 122 of the Planning Act 2008, including where the land is required for purposes incidental to the authorised development. Any acquisition of land for an incidental purpose must therefore be shown to facilitate the delivery of the authorised development and satisfy the statutory tests for compulsory acquisition in the same manner as any other land subject to compulsory acquisition powers. The justification for the compulsory acquisition powers sought is set out in the **Statement of Reasons** [APP-032].
Q7.1.13	The applicant	**Part 5 Article 21 (Compulsory acquisition of land)** Please explain why article 21 does not refer to article 22 (time limit for exercise of authority to acquire land compulsorily) and article 29 (Acquisition of subsoil or airspace only) and clarify whether such cross-references are required. If references are not required, please provide justification.
		The **Draft DCO** (Doc Ref. 3.1 Rev 3) has been updated at Deadline 3 to include references to article 22 (time limit for exercise of authority to acquire land compulsorily) and article 29 (acquisition of subsoil or airspace only) within article 21.
Q7.1.14	The applicant	**Part 5 Article 25 (Private rights)** Further to paragraph 23.4 of Advice Note Fifteen: drafting Development Consent Orders, are there any instances where article 25 should be subject to a power under a separate article which would allow the applicants to exclude a particular private right from the blanket extinguishment power? As set out at Good practice point 7 in Advice Note Fifteen, should there be a procedure set out in the relevant article such as the giving of notice or reaching agreement with the person who benefits from the right? This would ensure that only those rights which it is essential to extinguish are dealt with in this article.

ExQ1	Question to:	Question:
		The Applicant considers that article 25 appropriately reflects the guidance in Advice Note 15 and that no amendment is required. Article 25 clearly provides for the extinguishment or suspension of private rights and restrictive covenants only to the extent that their continuance would be inconsistent with the exercise of the authorised powers. The scope and effect of the power are therefore expressly identified. In relation to paragraph 23.4 of Advice Note 15, article 25(6)(a) expressly enables the undertaker, by notice, to disapply the extinguishment and suspension provisions in relation to specified private rights. The Applicant considers that this provides the mechanism contemplated by Advice Note 15 for excluding particular rights from the blanket extinguishment power where their extinguishment is not required. In relation to Good Practice Point 7, article 25(6) already provides a procedure by which specified rights may be preserved either through the giving of notice by the undertaker under article 25(6)(a) or by agreement with the beneficiary of the right under article 25(6)(b). Article 25(7) further clarifies the effect of such agreements on successors in title. The Applicant therefore considers that article 25 already contains appropriate mechanisms to ensure that only those rights which require extinguishment or suspension are affected, and that no amendment to the Draft DCO is necessary. The Applicant also notes that article 25 is substantially consistent with the equivalent private rights provisions contained in the made Tillbridge Solar Order 2025, Fenwick Solar Project Order 2026 and Green Hill Solar Farm Order 2026, including the ability to preserve rights through notice or agreement.
Q7.1.15	The applicant	Part 5 Article 31 (**Temporary use of land for constructing the authorised development)** Given the parliamentary approval to the TP regime under the NPA 2017, which was subject to consultation and debate before being enacted, should any provisions relating to notices/ counter

ExQ1	Question to:	Question:
		notices which do not reflect the NPA 2017 proposed regime (not yet in force) be modified to more closely reflect the incoming statutory regime where possible, including: • notice periods • the period for which temporary possession is required • the ability to serve a counternotice objecting to the proposed temporary possession so that the landowner would be the option to choose temporary possession or permanent acquisition where relevant.
		The Applicant refers the ExA to its response to question Q6.0.26.
Q7.1.16	All Statutory Undertakers	Part 5 Article 33 (Statutory undertakers) Please confirm whether statutory undertakers are content with the drafting of article 33. Where any statutory undertaker is not content with the wording, please identify the specific provisions of concern and explain the reasons.
Q7.1.17	The applicant	Part 6 Article 40 (Felling or lopping of trees and removal of hedgerows) Can the applicant: • Comment whether under article 40, is it appropriate to allow for a tree covered by a preservation order to be felled without any requirement to replace it? Should not a ratio of 1:1 for felled trees be more equitable for nature conservation? • Provide justification for why this article includes the power to carry out works to trees (as listed) 'near to any part of the authorised project….'. What is meant by 'near to any part of the authorised project' and how might this be implemented and enforced in practice when it relates to trees or shrubs on land outside of the OL?

ExQ1	Question to:	Question:
		• Provide an explanation as to how the provisions of the dDCO [REP1-006] and relevant outline management plans, manage and where necessary, require consent for the removal of trees? • Explain why it is necessary for this article to contain a general power for the removal of hedgerows in addition to those specified in schedule 10. Why can all hedgerows that may need to be removed not be identified at this stage? • Given the broad power to remove hedgerows under article 40, should additional drafting be included to require the prior consent of the relevant local planning authority for the removal of hedgerows not identified in schedule 10. Please provide justification for this. • Comment on whether further wording should be added to this article to provide protection to ancient or veteran trees. For example, should additional wording such as "...Paragraphs ....do not apply to any tree identified as ancient or veteran unless it has previously been agreed to be removed or managed or is agreed to be dead, dying or dangerous by the relevant planning authority and there is no alternative to its removal or management"
		(1) Trees subject to tree preservation orders The Applicant does not consider it necessary or appropriate to include a requirement within article 40 for replacement planting on a 1:1 basis in the event that a tree subject to a tree preservation order ("TPO") is felled. The purpose of article 40 and article 41 is to provide the powers necessary to construct, operate, maintain and decommission the Scheme. Landscape mitigation, replacement planting and ecological enhancement are secured through the requirements and the approved OLEMP, rather than through article 40 or article 41. The Applicant also notes that the **Arboricultural Impact Assessment** [APP-242] confirms that no loss of trees protected by a TPO is anticipated. In those circumstances, the Applicant does not

ExQ1	Question to:	Question:
		consider that a prescriptive replacement planting requirement within article 40 or article 41 is necessary. Further, the Applicant notes that equivalent provisions in other recently made solar DCOs, Tillbridge Solar Order 2025, Fenwick Solar Project Order 2026 and Green Hill Solar Farm Order 2026, do not include a requirement for replacement planting on a 1:1 basis where trees subject to a TPO are removed. The Applicant therefore considers the approach adopted in the dDCO to be consistent with recent DCO precedent. **(2) Trees "near to any part of the authorised development"** The purpose of the wording "near any part of the authorised development" is to enable the undertaker to address trees or shrubs which, whilst not located within the physical footprint of a work, may obstruct, interfere with, or present a danger to the construction, operation or maintenance of the authorised development. For example, a tree located outside the Order Limits may nonetheless have branches or roots that extend into the Order Limits and affect the safe construction, operation or maintenance of the authorised development. The power is not a general or unrestricted power to undertake tree works. It may only be exercised where the undertaker reasonably believes that the tree or shrub is causing, or is likely to cause, one of the specific issues identified in article 40(1)(a) to (c). The exercise of the power is therefore constrained by the statutory purposes for which it may be used. The phrase "near any part of the authorised development" is not intended to apply by reference to any prescribed distance from the authorised development. Rather, it captures trees and shrubs whose proximity to the authorised development gives rise to the obstruction, interference or safety risks identified in article 40(1)(a) to (c). The power would therefore only be exercised where there is a direct operational or safety-related connection between the tree or shrub and the authorised development.

ExQ1	Question to:	Question:
		The Applicant notes that the same drafting has recently been included in the Green Hill Solar Farm Order 2026. Whilst some other made solar DCOs adopt slightly different wording (for example by referring to trees within or overhanging the Order Limits), the effect is similar in that the relevant powers are directed towards trees and shrubs capable of affecting the construction, operation or maintenance of the authorised development. The Applicant therefore considers article 40 to be both necessary and appropriately constrained. **(3) Control of tree removal through the dDCO and outline management plans** Tree removal and management are controlled through a combination of articles 40 and 41, the **Hedgerow Regulations and Tree Preservation Orders Removal Plan – Section A Solar Development Area** [APP-026], the **Hedgerow Regulations and Tree Preservation Orders Removal Plan – Section B Grid Connection** [APP-027], the **OCEMP** (Doc Ref. 7.10 Rev 3), the **OLEMP** (Doc Ref. 7.16 Rev 2) and the relevant requirements in Schedule 2. Article 40 provides a limited power to fell, lop or cut back trees and shrubs where the undertaker reasonably believes this is necessary to prevent obstruction of, interference with, or danger to the construction, operation or maintenance of the authorised development. The exercise of this power is restricted to the circumstances specified in article 40(1). Article 41 addresses trees subject to a TPO made after the Order comes into force. Article 41 disapplies the requirement to obtain separate consent under the TPO regime where works are carried out pursuant to the DCO, whilst preserving the ability of the undertaker to carry out authorised works where necessary. The **Hedgerow Regulations and Tree Preservation Orders Removal Plan – Section A Solar Development Area** [APP-026] and the **Hedgerow Regulations and Tree Preservation Orders Removal Plan – Section B Grid Connection** [APP-027], identify the hedgerows and trees authorised

ExQ1	Question to:	Question:
		to be removed as part of the Scheme and forms part of the secured environmental mitigation package. During construction, vegetation clearance and tree protection measures would be undertaken in accordance with the **OCEMP** (Doc Ref. 7.10 Rev 3), the **OLEMP** (Doc Ref. 7.16 Rev 2), and the measures identified in **Arboricultural Impact Assessment** [APP-242]. These documents include measures relating to vegetation clearance, the protection of retained trees and the management of construction activities in proximity to retained trees. During operation, landscape management, replacement planting, habitat management and the ongoing management of retained trees and vegetation would be undertaken in accordance with the **OLEMP** (Doc Ref. 7.16 Rev 2), with relevant measures also secured through the **OOEMP** (Doc Ref. 7.11 Rev 2). In addition, Schedule 2 requires the approval of the relevant plans before commencement and secures implementation of the approved environmental mitigation and management measures. Accordingly, tree removal is controlled through the dDCO and the approved management plans, with the scope for removal being limited to that authorised by the Order and undertaken in accordance with the approved mitigation and management measures. **(4) Hedgerow removal powers** The Applicant notes that article 40(4) does not confer a general power to remove hedgerows. Article 40(4) is expressly limited to the hedgerows identified in Schedule 10 and only to the extent authorised by the approved LEMP. Schedule 10 identifies the relevant hedgerows, the extent to which they may be removed, managed or affected, and the purpose of the proposed works. Those hedgerows are also shown on the **Hedgerow Regulations and Tree Preservation Orders Removal Plan – Section A Solar Development Area** [APP-026] and the **Hedgerow Regulations and Tree**

ExQ1	Question to:	Question:
		Preservation Orders Removal Plan – Section B Grid Connection [APP-027], which would be certified documents. The Applicant therefore does not agree that article 40 contains a general power to remove unidentified hedgerows. To the extent that Part 3 of Schedule 10 identifies hedgerows which are potentially affected, this reflects a proportionate approach whereby the specific hedgerows which may require removal or management have been identified in advance, whilst allowing for limited flexibility in relation to detailed design and construction requirements. The Applicant does not consider it reasonably practicable to provide greater certainty at this stage. **(5) Requirement for local planning authority consent** The Applicant does not consider that additional drafting requiring the prior consent of the relevant local planning authority for the removal of hedgerows not identified in Schedule 10 is necessary. Article 40(4) does not authorise the removal of unidentified hedgerows. Rather, the provision is limited to the specific hedgerows identified in Schedule 10 and shown on the **Hedgerow Regulations and Tree Preservation Orders Removal Plan – Section A Solar Development Area** [APP-026] and the **Hedgerow Regulations and Tree Preservation Orders Removal Plan – Section B Grid Connection** [APP-027]. The Applicant therefore considers that the drafting already provides an appropriate and proportionate level of control. **(6) Ancient and veteran trees** The Applicant does not consider it necessary to amend article 40 to include additional provisions relating to ancient or veteran trees. The Scheme does not propose the removal of any ancient or veteran trees. The **Arboricultural Impact Assessment** [APP-242] confirms that no veteran or ancient trees are to be removed and that

ExQ1	Question to:	Question:
		their retention and protection is secured through the **OCEMP** (Doc Ref. 7.10 Rev 3). The **Arboricultural Impact Assessment** [APP-242] also confirms that retained trees, including identified veteran and ancient trees, will be managed in accordance with the **OLEMP** (Doc Ref. 7.16 Rev 2). The Applicant therefore considers that appropriate protection for ancient and veteran trees is already secured through the environmental documents and the requirements of the Draft DCO. In circumstances where no removal of ancient or veteran trees is proposed, the Applicant does not consider that the additional drafting suggested by the Examining Authority is necessary.
Q7.1.18	The applicant	**Part 6 Article 41 (Trees subject to tree preservation orders)** Article 41(1)(a) is drafted such that trees subject to tree preservation orders (TPO) made after the date of the Order may be felled, lopped or cut back where considered necessary for the authorised development. Please explain what protection would be afforded to trees that are subject to TPOs in force prior to the making of the Order and how such trees would be safeguarded from unnecessary works. The ExA notes that alternative drafting has been included in other made Orders, including the Fenwick Solar Farm Order 2026. Please explain why a similar approach has not been adopted in this dDCO and provide justification for the proposed drafting.
		Paragraph 7.8.1 of the **Arboricultural Impact Assessment** [APP-242] confirms that no trees subject to a TPO, or any other statutory or non-statutory tree protection designation, at the time of writing would be impacted by the Scheme. Article 41 has been deliberately drafted to apply only to TPOs made after the Order comes into force. Its purpose is to ensure that a TPO made after the grant of development consent cannot prevent the implementation, operation, maintenance or decommissioning of the authorised development. The power is limited in scope and may only be exercised where the undertaker reasonably believes this is necessary to prevent a tree obstructing or interfering with the authorised development.

ExQ1	Question to:	Question:
		Article 41(2)(a) also requires the undertaker to do no unnecessary damage to any tree and provides compensation for any resulting loss or damage. Whilst the Applicant acknowledges that alternative drafting was adopted in the Fenwick Solar Farm Order 2026, the drafting proposed in the dDCO is consistent with the Green Hill Solar Farm Order 2026. Given that no existing TPO trees would be affected by the Scheme, the Applicant considers the proposed drafting to be appropriate and proportionate and reflective of the circumstances of the Scheme.

Schedule 1 – Authorised development

2.7.3. The below table sets out the Applicant's response to the ExA's written questions relating to Schedule 1 – Authorised development.

Table 2.7-3: Schedule 1 – Authorised development

ExQ1	Question to:	Question:
Q7.2.1	The applicant	**Associated development** The ExA notes the content of paragraph 1.4.8 of the Explanatory Memorandum (EM) [REP1-008]. However, for each element of the proposed development identified as associated development, please explain and justify how it satisfies the tests for associated development under s115 of the PA2008. Additionally, clarify how each element is directly associated with the main development, is subordinate to it, and necessary for construction and/ or operation.
		The Applicant confirms that each element of associated development included within Schedule 1 satisfies the tests for associated development under section 115 of the Planning Act 2008. In each case, the relevant works are directly associated with the principal development (being the generating station and associated electrical infrastructure), are subordinate to that principal

ExQ1	Question to:	Question:
		development, and are required to facilitate its construction, operation, maintenance and/or decommissioning. The Applicant further confirms that none of the elements of associated development comprise development which would itself constitute an NSIP requiring separate consent. Rather, the associated development comprises works that are ancillary and functionally linked to the principal development and which are appropriately authorised as associated development under section 115 of the Planning Act 2008. The Applicant notes that the categories of associated development included within Schedule 1 are standard for solar DCO projects and are materially consistent with those authorised under numerous recently made solar DCOs, including schemes incorporating substantial transmission and grid connection infrastructure. The Applicant is not proposing any novel category of associated development that has not previously been accepted through the DCO process. The categories of associated development authorised by the Draft DCO are consistent with those authorised by recent made solar DCOs, including the Fenwick Solar Farm Order 2026, Green Hill Solar Farm Order 2026 and Tillbridge Solar Order 2025. They are also broadly consistent with associated development authorised in recent electricity transmission DCOs, including The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and The National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant therefore does not consider it necessary or proportionate to provide an individual section 115 assessment for each item listed in Schedule 1. However, if the ExA has concerns regarding any specific element of associated development, the Applicant would be pleased to provide further justification in relation to that particular item.
Q7.2.2	The applicant	**Cable sealing end compounds – Work Nos. 10, 12 and 14**

ExQ1	Question to:	Question:
		Work Nos. 10, 12 and 14 within schedule 1 state that landscaping and mitigation planting would form part of the CSEC construction and installation. Please signpost to where such landscaping and mitigation planting is shown on any figures.
		The landscaping and mitigation planting associated with Work Nos. 10 and 12 is shown within the **OLEMP** (Doc Ref. 7.16 Rev 2), specifically on the Outline Landscape Masterplans (Sheet 26). In respect of Work No. 14, the reference to landscaping and mitigation planting relates to the potential provision of a cable sealing end compound should one ultimately be required as part of the final design. As the location and need for any such cable sealing end compound within Work No. 14 has not been determined, no specific landscaping or mitigation planting is shown on the application drawings for Work No. 14. Should a cable sealing end compound be brought forward within Work No. 14, any associated landscaping and mitigation planting would be developed through the detailed design process and secured through the relevant approved landscape and environmental management plans.
Q7.2.3	The applicant	**Cable sealing end compounds – Work Nos. 10 and 12** Please explain why permanent compounds and associated security fencing and gates and access road are required.
		The cable sealing end compounds (CSECs) associated with Work Nos. 10 and 12 are required to facilitate the transition between the overhead line and underground cable sections of the transmission connection. The compounds will house the high-voltage equipment necessary for this transition, including cable sealing ends and associated switchgear. The permanent compounds, security fencing, gates and access roads are required because the equipment housed within the CSECs forms part of the operational transmission connection and must remain in place for the operational life of the Scheme. Ongoing access is required to allow for the operation, inspection, maintenance, repair and replacement of the equipment and, given the

ExQ1	Question to:	Question:
		nature of the infrastructure, public access within the compounds must be restricted for operational and safety reasons. The Applicant has therefore sought permanent rights and powers in respect of the CSECs in the same manner as for other operational electrical infrastructure within the Scheme (such as the 400kV On-Site Substation). The Applicant also notes that a similar approach has been adopted in recent transmission DCOs. For example, the National Grid (Bramford to Twinstead Reinforcement) Order 2024 authorises permanent cable sealing end compounds, including permanent compounds, security fencing, gates, access roads and associated landscaping at the cable sealing end compounds. Similarly, the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 authorises permanent cable sealing end compounds containing sealing end equipment, switchgear, earthing and protection control systems, together with permanent landscaping works and associated operational infrastructure. The Applicant therefore considers the approach adopted for Work Nos. 10 and 12 to be both appropriate and well precedented.
Q7.2.4	The applicant	**Overhead electric line – Work No. 14** Paragraph 2.8.13 of ES Chapter 2 [AS-017] explains that while the GCR is assumed to connect to Weston Marsh B substation via an overhead line, it also states that the parameters established for the proposed CSEC at the 132kV overhead line crossing would be applied to allow for optionality to underground the GCR. Similarly, paragraph 5.2.75 of the PS [APP-260] states that to accommodate uncertainty around the siting of the Weston Marsh substations and the final routing of the Grimsby to Walpole and Weston Marsh to East Leicestershire overhead lines, the applicant has sought a proportionate degree of flexibility within the application to accommodate this uncertainty and has provided for flexibility for different routing alignments in the final section of the GCR. However, paragraph 2.1.4 of the Connection to the National Grid Weston Marsh Substation Note [REP1-094] states that any alternative overhead or underground routing through this area of Work

ExQ1	Question to:	Question:
		No. 14 would not be limited to a single predefined "Scenario Two" and that a range of alternative connection arrangements could be required. The ExA notes that the dDCO makes provision for the installation of overhead electric lines and the installation of underground electrical cables in Work No.14. Please explain how the dDCO is drafted to ensure that only one option is taken forward in Work No.14.
		The **Draft DCO** (Doc Ref. 3.1 Rev 3) includes flexibility within Work No. 14 to accommodate uncertainty regarding the final grid connection arrangement in the vicinity of Weston Marsh substation. Accordingly, Work No. 14 provides for both overhead electric lines and underground electrical cables. The environmental assessment has been undertaken on a Rochdale Envelope basis and assesses the reasonable worst-case parameters associated with the alternative connection arrangements. As a result, any connection arrangement ultimately taken forward would fall within the scope of the assessed development and assessed environmental effects. The Applicant does not intend to construct both an overhead line and an underground cable connection serving the same purpose within Work No. 14. Rather, the flexibility allows for different connection solutions to be implemented in different locations within Work No. 14, depending on the final connection design and interface with National Grid infrastructure. The final connection arrangement would therefore comprise the infrastructure necessary to achieve the connection, whether overhead, underground or a combination of both in different locations, but would not result in duplication of connection infrastructure serving the same purpose in the same location. There would be no operational, technical or commercial benefit in constructing duplicate connection infrastructure and doing so would result in unnecessary cost and land take. In terms of ensuring that land not ultimately required is not acquired, the Applicant notes that the compulsory acquisition powers within the **Draft DCO** (Doc Ref. 3.1 Rev 3) are expressly limited to land required to deliver the authorised development. Article 21(1)(a) provides that the undertaker may only acquire

ExQ1	Question to:	Question:
		compulsorily "so much of the Order land as is required for the authorised development or to facilitate, or as is incidental, to it". The undertaker is therefore not empowered to acquire additional land which is neither required for, nor facilitates, the authorised development. The extent of any land or rights ultimately required would be determined through the detailed design process and would reflect the final connection solution taken forward. The Applicant considers that the **Draft DCO** (Doc Ref. 3.1 Rev 3) appropriately secures this flexibility whilst ensuring that only the infrastructure required for the final connection arrangement is delivered and that the authorised development remains within the parameters assessed in the Environmental Statement.
Q7.2.5	The applicant	**Work No. 3B** Please confirm whether the description of Work No.3B should be amended to refer to the "development of onsite 132kV substations and associated works including-", given more than one 132kV substation is proposed?
		This has been corrected in the **Draft DCO** (Doc Ref. 3.1 Rev 3) submitted at Deadline 3.
Q7.2.6	The applicant	**Work No. 5** Should Work No.5(a) also include reference to Works No.6?
		Work No. 5(a) relates to the electrical cables forming part of the authorised development, whereas Work No. 6 comprises access works to facilitate construction and operation of the authorised development. The Applicant does not consider it necessary to refer to Work No. 6 within the description of Work No. 5(a). Work No. 5(a) describes the electrical cable infrastructure and associated connections between the principal elements of the authorised development, whilst Work No. 6 separately authorises the access works required to facilitate construction and operation of the Scheme.

ExQ1	Question to:	Question:
		The relationship between these works is already clearly shown on the Work Plans [APP-009], including where the routes or locations of Work No. 5 and Work No. 6 overlap. The Applicant therefore considers that the distinction between the two works is clear and that no amendment to Work No. 5(a) is necessary.
Q7.2.7	The applicant	**Work No. 11** Please confirm whether the wording "to facilitate a connection between the Cable Sealing End Compound South and the Cable Sealing End Compound North" at the end of the final sentence is necessary, given that it is already included earlier in the text.
		The Applicant agrees that the words "to facilitate a connection between the Cable Sealing End Compound South and the Cable Sealing End Compound North" are unnecessary, as the purpose and extent of Work No. 11 are already described earlier in the Work No. 11 drafting. The wording has therefore been removed from the **Draft DCO** (Doc Ref. 3.1 Rev 3) submitted at Deadline 3.
Q7.2.8	The applicant	**Work No. 16** Given their temporary nature, please amend the title of Work No.16 to "Grid Connection Corridor Temporary Site Compounds".
		The Applicant agrees that, given their temporary nature, the title of Work No. 16 should refer to temporary site compounds. The title has been amended to "Grid Connection Route Temporary Site Compounds" in the **Draft DCO** (Doc Ref. 3.1 Rev 3) submitted at Deadline 3.
Q7.2.9	The applicant	**Solar Generating Station Temporary Site Compounds** The ExA note that Work No.16 is for the construction of temporary site compounds for the grid connection corridor. Please explain why there is no separate work number for the solar generating station temporary site compounds and please signpost to how these would be controlled within the dDCO.

ExQ1	Question to:	Question:
		A separate work number for temporary site compounds associated with the solar generating station has not been included because such compounds are already expressly authorised through Work No. 5(k), which includes "construction and decommissioning compounds, including site and welfare offices and areas to store materials and equipment". The Applicant has adopted a different approach for the solar generating station and the Grid Connection Route due to the differing nature of the works. Within the solar generating station area, temporary compounds are ancillary to the construction of the solar generating station and may be located within the wider areas authorised for the solar generating station and associated works. The precise location, size and configuration of those compounds will be determined through the detailed design and construction methodology and it is therefore not necessary to identify separate areas for such compounds through a standalone work number. By contrast, Work No. 16 identifies specific areas within the Grid Connection Route where temporary compounds may be established in connection with the construction, maintenance and decommissioning of the grid connection infrastructure. This provides flexibility for the delivery of the grid connection works, including where the final design and construction methodology may influence the location of compounds required along the grid connection route. Temporary compounds associated with the solar generating station are controlled through Work No. 5(k) and the requirements in Schedule 2, including Requirement 5 (Detailed Design Approval) and Requirement 12 (Construction Environmental Management Plan). The approved details and management plan submitted pursuant to those requirements will govern the siting, management and operation of temporary construction compounds. The Applicant therefore considers that a separate work number for solar generating station temporary site compounds is unnecessary, as those compounds are already expressly authorised through Work No. 5(k) and are subject to appropriate control through the requirements of the draft DCO and the approved management plans.

ExQ1	Question to:	Question:
Q7.2.10	Lincolnshire County Council South Holland District Council The applicant	**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. To the applicant: Please confirm which of the associated development works would be subject to the proposed design parameters [REP1-055]?
		The Applicant confirms that all associated development has been assessed as part of the Environmental Statement. As set out in paragraph 1.2.2 of the **Design Parameters** [REP1-055], associated development listed in Schedule 1 to the draft DCO will be subject to the design parameters where applicable. Where specific design parameters do not apply, the relevant works are controlled through the requirements and management plans secured by the Draft DCO. The associated development provision is a standard feature of DCOs and is included to ensure that ancillary works required in connection with the authorised development are authorised without the need for subsequent amendments to the DCO, provided they remain within the Order Limits and do not give rise to materially new or materially different environmental effects from those assessed in the Environmental Statement.

Schedule 2 – Requirements

2.7.4. The below table sets out the Applicant's response to the ExA's written questions relating to Schedule 2 – Requirements.

Table 2.7-4: Schedule 2 – Requirements

ExQ1	Question to:	Question:
Q7.3.1	The applicant	**General** Many of the draft requirements include the phrase "must be substantially in accordance with…". How does the use of "substantially in accordance with…" provide the necessary precision and certainty, especially as it is used in relation to outline principles and management plans? The ExA suggest this phrase is amended to 'must be in accordance with'. If this wording is not to be used, please provide justification.
		The Applicant refers the ExA to its response at table 3-5, row EA4 of the **Relevant Representations Report** [REP1-074], which sets out the Applicant's position on the use of the phrase "substantially in accordance with".
Q7.3.2	The applicant Lincolnshire County Council South Holland District Council	**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.
		Construction working hours are secured through section 2.4 of the **OCEMP)** (Doc Ref. 7.10 Rev 3), which is a certified document secured by Requirement 12 of the Draft DCO. The OCEMP specifies core construction working hours and identifies the limited categories of activity that may need to be undertaken outside those core hours. The Applicant does not consider it appropriate to include construction working hours in a standalone requirement. The OCEMP contains a number of activity-specific exceptions, including certain highway works, abnormal indivisible load deliveries, cable jointing, trenchless installation

ExQ1	Question to:	Question:
		activities, testing and commissioning activities, emergency works and activities required for safety reasons. The nature and extent of any such exceptions may evolve during the construction phase and may require agreement with the relevant planning authorities through the approval of the detailed CEMP. Securing construction working hours through the CEMP therefore provides an appropriate degree of flexibility whilst ensuring that working hours remain subject to the approval and oversight of the relevant planning authority. The Applicant also notes that this approach is consistent with a number of recent solar DCOs, including the Tillbridge Solar Order 2025, Fenwick Solar Farm Order 2026 and Springwell Solar Farm Order 2026, which similarly do not include a standalone requirement controlling construction working hours.
Q7.3.3	The applicant	**Requirement 2 (Commencement of the authorised development)** The ExA notes the detail contained within paragraph 6.2.8 of the EM [REP1-008] in respect of the uncertainty of a firm Gate 2 connection offer and the response to LCC in the 'Applicant's Comments on Local Impact Reports' [REP2-015]. However, given the applicant's certainty of progressing to a Gate 2 offer, please provide further detailed justifications for the proposed seven-year period, rather than the five-year period commonly provided for in other DCOs. In particular, please identify additional project-specific circumstances, over and above those already listed, which would necessitate the additional two-year period.
		The Applicant maintains that the seven-year commencement period in Requirement 2 is appropriate and justified in the particular circumstances of the Scheme. As explained in the **Explanatory Memorandum** (Doc Ref. 3.2 Rev 3), the primary justification for the extended commencement period is the uncertainty associated with the ongoing NESO grid connection reform process and the timing of both a firm Gate 2 connection offer and a confirmed

ExQ1	Question to:	Question:
		connection date. Whilst the Applicant remains confident that the Scheme will progress through the Gate 2 process and intends to apply for Gate 2 status as soon as the relevant application window opens, the timing of that process remains outside the Applicant's control. The Applicant notes that the Gate to Whole Queue programme has already been subject to a number of revisions and delays. Milestones within the process have moved from the original programme and the issuing by NESO of Gate 2 offers is now expected to continue throughout 2026 and into 2027. The Applicant considers that this demonstrates that, whilst the Applicant remains confident that the Scheme will progress through the Gate 2 process, the timing of the issue of a final connection offer and confirmation of a connection date remains outside the Applicant's control and subject to ongoing programme adjustments at the hands of NESO. The significance of this uncertainty extends beyond the receipt of a Gate 2 offer itself. Before committing to construction, the Applicant requires sufficient certainty regarding the final connection arrangements, connection date and associated commercial arrangements to support a final investment decision. Whilst the Applicant is actively progressing the Scheme, those matters cannot be finalised until the relevant stages of the connection process have been completed. The proposed commencement period therefore provides an appropriate degree of flexibility should the reform process, or the implementation of its outcomes, take longer than is currently anticipated. In addition, the delivery of the Scheme is dependent not only on the Applicant's own programme, but also on the delivery and commissioning of the wider transmission infrastructure required to facilitate the connection, particularly those being delivered under NGET's G2W project. Even where a connection date has been identified through the reform process, energisation remains dependent on third-party transmission works and network upgrades outside the Applicant's control. Any delay to those works could directly affect the timing of the Scheme's connection and operation. The Applicant therefore considers that the circumstances of the Scheme differ from those of projects where a conventional five-year commencement period may be appropriate. In particular,

ExQ1	Question to:	Question:
		the Scheme is being progressed during a period of significant reform of the electricity connections regime, at a time when both the timing of final connection offers and the delivery of the associated network infrastructure remain subject to factors outside the Applicant's control. The Applicant therefore considers that the seven-year commencement period provides a reasonable and proportionate degree of flexibility to accommodate matters outside its control whilst ensuring that the Scheme can be delivered once the necessary connection arrangements and associated transmission infrastructure are in place. The Applicant notes that a seven-year commencement period is not without precedent, including within the Cory Decarbonisation Project Order 2025, where an extended commencement period was justified by uncertainty arising from external regulatory and delivery processes outside the Applicant's control. While the circumstances differ from those of the Scheme, the Applicant considers that a similar principle applies here, namely that an extended commencement period is appropriate where the timing of key enabling processes cannot be controlled by the undertaker.
Q7.3.4	The applicant	**Requirement 4 (Community liaison group)** R4(1) states that "…aim is to facilitate liaison between representatives of people living in the vicinity of the Order limits…". Please define what is meant by 'vicinity' and how the extent of 'vicinity' has been determined. In respect of the 'approved terms of reference' detailed in R4(2), will these be made available during the examination and who is/ will be involved in the drafting of the terms?
		The term "vicinity" is intentionally not defined. Its purpose is to ensure that the community liaison group can include representatives of communities and other interested parties who may be affected by, or have an interest in, the construction and operation of the authorised development. The Applicant considers that prescribing a fixed geographical boundary would be unnecessarily restrictive and could inadvertently exclude individuals or organisations with a legitimate interest in the authorised development, for example those who work in the area but do not reside within a

ExQ1	Question to:	Question:
		defined distance of the Order Limits. The detailed arrangements for membership and representation will instead be established through the terms of reference. In practice, the Applicant anticipates that representation would include the parish councils and communities currently engaged in relation to the Scheme, together with the relevant planning authority and other stakeholders with a legitimate interest in the authorised development. However, the Applicant considers it important to retain flexibility to review membership over time and respond to changing circumstances throughout the construction and operation of the Scheme, rather than prescribing a fixed geographical boundary. This approach is consistent with a number of recent solar DCOs, including Green Hill Solar Farm Order 2026, One Earth Solar Farm Order 2026, Fenwick Solar Farm Order 2026, and Tillbridge Solar Order 2025, which contain equivalent community liaison group requirements without defining the extent of the relevant "vicinity". The terms of reference will be prepared by the undertaker and approved by the relevant planning authority pursuant to Requirement 4. The Applicant considers that the relevant planning authority is best placed to approve the initial terms of reference, having regard to its understanding of the local community and planning matters relevant to the authorised development. Once established, the community liaison group will provide a forum through which community representatives can influence the operation of the group and the matters considered by it. The Applicant has prepared an example of what terms of reference for the Community Liaison Group could contain, which are provided at **Appendix C**. These are intended to provide an example of what the terms of reference could look like, based on examples from other solar NSIPs. The Applicant considers it appropriate for the final terms of reference to be prepared by the undertaker, in liaison with the community, and approved by the relevant planning authority pursuant to Requirement 4, following any further engagement considered necessary. While approved by the relevant planning authority, it is envisaged that the terms of reference would not be static and

ExQ1	Question to:	Question:
		would be broad enough to allow the members of the CLG to determine their own direction going forward once the regular meetings have commenced.
Q7.3.5	The applicant	**Requirement 5 (Detailed design approval)** Please consider restructuring R5(1) including: • At (g) splitting out the wording 'relating to that part have been submitted and approved by the relevant planning authority' from the list (a) – (g) for clarity, • At (g) splitting refuse or other storage units, fencing, signs and lighting into their own sub-category and not placed together, • Confirm why drainage, water, power and communication cables and pipelines have not been included within this list. With regard to R5(2), please comment as to why the details submitted should not also accord with the location and order limit plans, the works plans and the principles and assessments set out within the ES alongside the design parameters statement. Given the scope of R5, please explain why LCC, in its capacity as the relevant local highway authority, has not been listed as a consultee? If this is not considered necessary, please provide justification.
		The Applicant has reviewed Requirement 5 and, in response to the ExA's comments, has updated the drafting of Requirement 5(1) at Deadline 3 to: • separate the approval wording from the list of matters in sub-paragraphs (a) to (g); and • split out refuse or other storage units, fencing, signs and lighting into separate sub-paragraphs for improved clarity. In relation to drainage, water, power and communication cables and pipelines, the Applicant does not consider it necessary to include these matters within Requirement 5. Such infrastructure is

ExQ1	Question to:	Question:
		generally ancillary to the principal elements of the authorised development and does not give rise to the same design, landscape and visual considerations as the above-ground infrastructure that is expressly controlled through Requirement 5. The Applicant also notes that equivalent detailed design requirements in a number of recently made solar DCOs, including the One Earth Solar Farm Order 2026, Tillbridge Solar Order 2025, Springwell Solar Farm Order 2026 and Green Hill Solar Farm Order 2026, do not require approval of drainage, water, power and communication cables or pipelines through the detailed design approval requirement. In respect of Requirement 5(2), the Applicant does not consider it necessary to refer expressly to the **Overall Location Plan** [APP-007]. The Applicant is unaware of any separate "Order Limits Plan" submitted as part of the application. The Location Plan is not a certified document and is not a document by which reference to which the authorised development is carried out. In addition, the Location Plan does not identify any matters that are not already shown on the Works Plans and Land Plans, which define the location and extent of the authorised development and the Order Limits respectively. The Applicant therefore does not consider that an express reference to the Location Plan would provide any additional control or certainty. The Applicant notes that this approach is consistent with recent solar DCO precedent. The Applicant also does not consider it necessary to refer expressly to the Works Plans, as article 3 (Development consent etc. granted by the Order) already requires the authorised development to be carried out in accordance with the Works Plans, subject to the powers and provisions contained in the Order. Similarly, the Applicant does not consider it necessary to refer expressly to the principles and assessments contained within the Environmental Statement. The environmental parameters assessed through the Environmental Statement are secured through the Design Parameters, with requirement 5(2) requiring the detailed design to accord with those parameters. In addition, article 3

ExQ1	Question to:	Question:
		requires the authorised development to be carried out in accordance with the parameters shown on the Works Plans, and article 5(3) provides that maintenance activities may not give rise to materially new or materially different effects from those assessed in the Environmental Statement. The Applicant therefore considers that the relevant environmental parameters are already secured through the draft DCO and that a further cross-reference to the Environmental Statement is unnecessary. The Applicant does not consider it necessary for Lincolnshire County Council, in its capacity as local highway authority, to be listed as a consultee under Requirement 5. Requirement 5 is directed towards approval of the detailed design of the authorised development by the relevant planning authority. Specific highway matters are instead controlled through other provisions of the **Draft DCO** (Doc Ref. 3.1 Rev 3), including article 15(b) (access to works), which requires consultation with the highway authority where additional accesses are proposed, Requirement 12 (Construction Environmental Management Plan), Requirement 13 (Operational Environmental Management Plan), Requirement 15 (Construction Traffic Management Plan) and Requirement 17 (Public Rights of Way), each of which secures consultation with and approval from the relevant highway authority where appropriate. The Applicant therefore considers that a separate highway authority consultation requirement under Requirement 5 would duplicate controls already secured elsewhere in the **Draft DCO** (Doc Ref. 3.1 Rev 3).
Q7.3.6	The applicant	**Requirement 7 (Landscape and ecology management plan) and Requirement 8 (Biodiversity Net Gain)** Given the scope of both R7 and R8, please explain why LCC has not been listed as a consultee? If this is not considered necessary, please provide justification.
		The Applicant has amended Requirements 7 (Landscape and Ecology Management Plan) and 8 (Biodiversity Net Gain) to include consultation with Lincolnshire County Council prior to approval of the relevant documents.

ExQ1	Question to:	Question:
Q7.3.7	The applicant	**Requirement 7 (Landscape and ecology management plan)** Noting the comments made by LCC in their D2 submission [REP2-022], please review the definition of 'commence' and amend if required. Please also confirm: • What 'part (h)' and 'part (i)' are referring to, • How the wording of the requirement would enable advance planting for the purposes of screening.
		The Applicant's response to LCC's comments regarding the definition of 'commence' is set out within the **Applicant's Comments on Deadline 2 Submissions** (Doc Ref. 8.38), table 2-1, row 3.3. Parts (h) and (i) are references to the definition of "permitted preliminary works" in article 2 of the Draft DCO. Specifically: • part (h) refers to site clearance (including vegetation removal); and • part (i) refers to advanced planting to allow for an early establishment of protective screening. <u>Advanced Planting for Protective Screening</u> Requirement 7 secures the submission and approval of a LEMP prior to commencement of the relevant part of the authorised development. Requirement 7(4) expressly provides that, for the purposes of Requirement 7, "commence" includes "advanced planting to allow for an early establishment of protective screening". As a result, advanced planting cannot be undertaken until the relevant LEMP has first been approved by the relevant planning authority. The approved LEMP must be substantially in accordance with the OLEMP and will include details of the planting and landscaping measures to be implemented.

ExQ1	Question to:	Question:
		The effect of Requirement 7 is therefore to enable advanced planting for screening purposes whilst ensuring that such planting is undertaken in accordance with an approved LEMP. This allows landscaping mitigation to be established at an early stage, whilst retaining appropriate control by the relevant planning authority over the details of the planting proposals.
Q7.3.8	The applicant	**Requirement 8 (Biodiversity Net Gain)** Please consider re-drafting for the purposes of clarity and enforceability, including splitting 8(2) into at least two sentences for clarity and removing the word 'as'.
		Requirement 8(2) has been updated in the **Draft DCO** (Doc Ref. 3.1 Rev 3) submitted at Deadline 3.
Q7.3.9	The applicant	**Requirement 11 (Archaeology)** Please explain why a final archaeological mitigation and management strategy is to be submitted and not a management plan.
		The Applicant's response to this matter is set out in the **Relevant Representation Report** [REP1-074], ref LCC-028. The Applicant additionally notes that the use of a strategy document, rather than a management plan, for securing archaeological mitigation is consistent with the approach adopted in a number of recent made DCOs, including the Fenwick Solar Farm Order 2026, Springwell Solar Farm Order 2026 and Tillbridge Solar Order 2025. The Applicant therefore considers the drafting to be appropriate and consistent with recent precedent.
Q7.3.10	The applicant	**Requirement 12 (Construction environmental management plan)** R12 prevents commencement of the authorised development, including permitted preliminary works, until a CEMP has been submitted to and approved by the relevant planning authority. However, R12(2), provides some exceptions to permitted preliminary works including removal of plant and machinery and advanced planting. Can the applicant please:

ExQ1	Question to:	Question:
		• Confirm what plant and machinery are anticipated to be removed prior to approval of the CEMP and explain why such activities need to be undertaken before the CEMP is in place. • Explain what activities would be involved in undertaking advanced planting before approval of the CEMP, including any associated site preparation, excavation, access requirements, soil handling or ancillary works and how environmental effects arising from these activities would be managed. Furthermore, R12(4) requires that the CEMP includes a site waste management plan. How does this relate to requirement 14 (Waste management plan) and if there is any overlap, and should the relevant waste authority be included as a relevant consultee as they are in requirement 13 (Operational environmental management plan)?
		Plant and machinery The reference to the removal of plant and machinery in requirement 12(2) relates to plant and machinery associated with those permitted preliminary works which are expressly excluded from the requirement to obtain approval of a CEMP before commencement. Such activities may include environmental surveys and other non-intrusive surveys and investigations for the purpose of assessing ground conditions. The plant and machinery anticipated to be used for these activities is likely to include survey vehicles (such as 4x4 vehicles, crew buses and welfare vans), drilling rigs for boreholes, excavators for trial pits, tracked dumpers and associated support vehicles used to transport equipment and materials to site. These activities are permitted prior to approval of the CEMP because they are preliminary in nature, are limited in scale and duration, and may be required to inform the detailed design and construction planning of the Scheme. The Applicant considers it would be disproportionate to require approval of a CEMP before undertaking these limited investigatory activities, which may themselves inform aspects of the construction methodology secured through the CEMP. The environmental effects of these activities have been assessed within the Environmental Statement

ExQ1	Question to:	Question:
		and would be undertaken within the parameters of the authorised development as assessed. They would also remain subject to the relevant requirements of the DCO, including those relating to archaeology, drainage and biodiversity, where applicable. **Advanced planting** Advanced planting would comprise the early implementation of approved landscape planting in advance of the main construction phase, enabling planting to establish at an earlier stage and contribute to landscape and visual mitigation as soon as practicable. The activities associated with advanced planting would be limited in scale and would principally comprise: • access to planting locations identified in the **OLEMP** (Doc Ref. 7.16 Rev 2) using existing site access points and light goods vehicles to transport plants, materials and personnel; • localised ground preparation, including the removal of competing vegetation where necessary and loosening of soils within the immediate planting area; • preparation of individual planting pits or slit trenches using hand tools such as spades, with mechanical ground preparation only where required for larger planting areas of hedgerow planting; • placement of trees, shrubs or hedgerow plants within prepared pits or trenches and backfilling and firming of soils around root systems; and • establishment and maintenance activities, including watering, weed control, adjustment of guards, replacement of failed plants and routine inspections (refer to paragraphs 5.4.5 and 5.4.6 of the **OLEMP** (Doc Ref. 7.16 Rev 2). No significant excavation, earthworks or soil handling activities beyond those necessary to establish the approved planting would be required. Any soil disturbance would be confined to the immediate planting locations and would be localised and temporary in nature.

ExQ1	Question to:	Question:
		The environmental effects associated with these activities have been assessed within the Environmental Statement. Advanced planting would be undertaken in accordance with the approved landscape mitigation secured through the LEMP in accordance with Requirement 7 of the Draft DCO. In addition, the **OLEMP** (Doc Ref. 7.16 Rev 2) includes measures for the establishment and maintenance of planting, including weed management, watering during periods of drought, replacement of failed plants and regular monitoring by the Landscape Clerk of Works, ensuring that environmental effects associated with advanced planting are appropriately managed. **Relationship between requirements 12 and 14** The Applicant confirms that the reference to a "site waste management plan" in requirement 12(4) was not intended to be a cross-reference to requirement 14. As drafted, requirement 12 secured waste management measures as part of the Construction Environmental Management Plan, whilst requirement 14 separately secured a waste management plan for the operational phase. The Applicant acknowledges that this drafting gave rise to potential confusion and duplication. Accordingly, the Draft DCO has been amended at Deadline 3 to: • remove the reference to a site waste management plan from requirement 12; and • amend requirement 14 so that it secures waste management measures across the construction, operation and decommissioning phases of the Scheme. The Applicant considers that these amendments provide a clearer and more proportionate framework for securing waste management measures and remove any overlap between requirements 12 and 14. The Applicant has also considered whether the relevant waste authority should be included as a consultee for requirement 14, as is the case under requirement 13. However, Lincolnshire County Council is both the relevant planning authority responsible for approving the waste management plan under requirement 14 and the relevant waste authority. The Applicant therefore does not

ExQ1	Question to:	Question:
		consider a separate consultation requirement to be necessary, as matters within the waste authority's remit will already be considered by Lincolnshire County Council when determining whether to approve the waste management plan.
Q7.3.11	The applicant	**Requirement 14 (Waste management plan)** Please confirm whether R14, currently titled 'Waste management plan' should be renamed 'Site waste management plan' to ensure consistency with the terminology used in both R12 and R14?
		The Applicant's response to this matter is set out in the **Applicant's Comments on Deadline 2 Submissions** (Doc Ref. 8.38), table 2-2, row 3.4.
Q7.3.12	The applicant	**Requirement 16 (Permissive path)** Should 16(2) read "The permissive path must be maintained and accessible by the public permitted for 364 days…"?
		This has been updated in the **Draft DCO** (Doc Ref. 3.1 Rev 3) submitted at Deadline 3.
Q7.3.13	Lincolnshire County Council	**Requirement 20 (Skills, supply chain and employment)** Please review R20(3) and confirm whether the wording is necessary.
Q7.3.14	South Holland District Council National Highways	**Requirement 21 (Decommissioning and restoration)** Please confirm whether you wish to be a consultee in respect of R21?

Schedule 3 – Legislation to be disapplied

2.7.5. The below table sets out the Applicant's response to the ExA's written questions relating to Schedule 3 – Legislation to be disapplied.

Table 2.7-5: Schedule 3 – Legislation to be disapplied

ExQ1	Question to:	Question:
Q7.4.1	All local authorities Natural England Environment Agency All Statutory Undertakers	**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.

Schedule 10 – Hedgerows to be removed, managed or affected

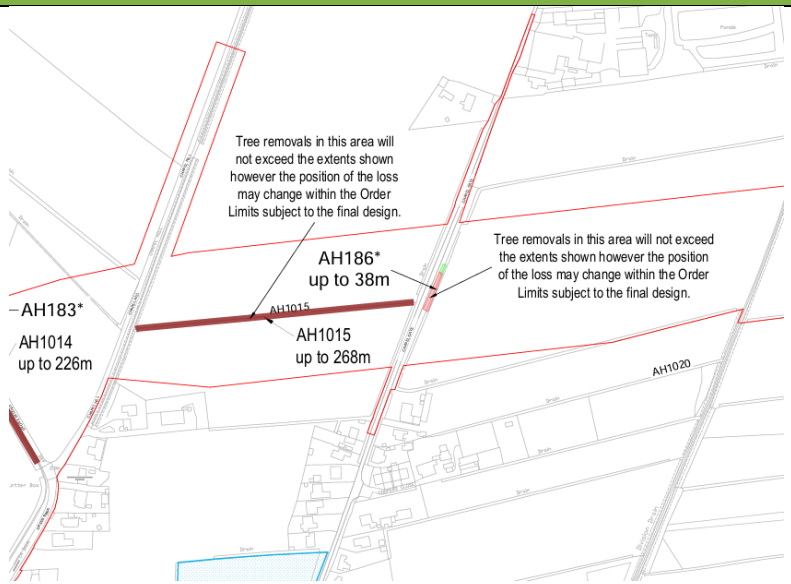
2.7.6. The below table sets out the Applicant's response to the ExA's written questions relating to Schedule 10 – Hedgerows to be removed, managed or affected.

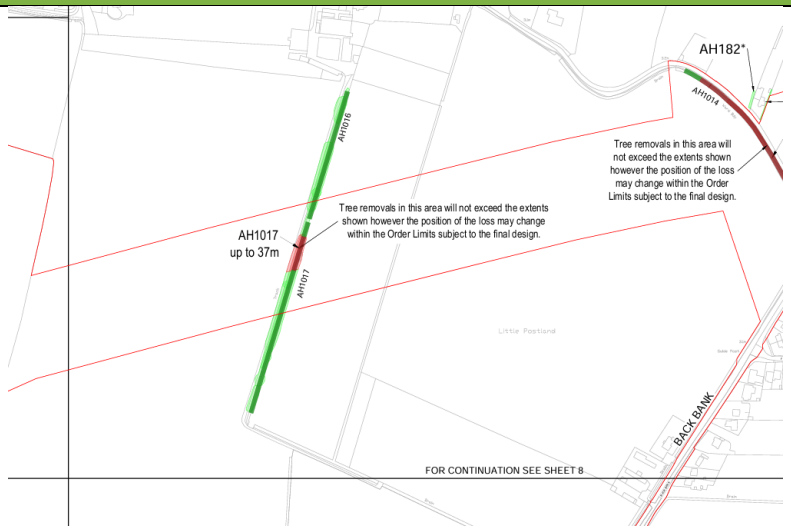
Table 2.7-6: Schedule 10 – Hedgerows to be removed, managed or affected

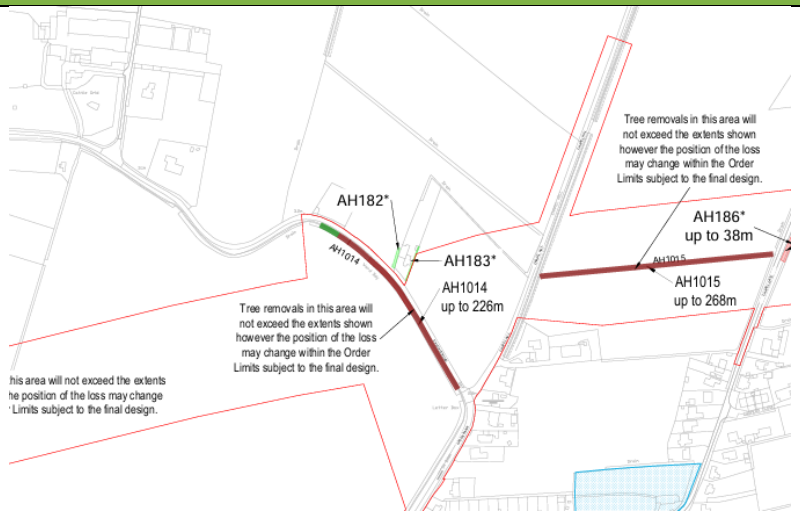
ExQ1	Question to:	Question:
Q7.5.1	The applicant	**Parts 1 and 2** In respect of parts 1 and 2 of schedule 10, please provide greater detail regarding the reason for removal. As currently drafted, the single description used is broad and offers no detail. Please confirm when it will be determined whether those hedgerows would be affected by the proposed development.

ExQ1	Question to:	Question:
		The Applicant does not consider that it is necessary or appropriate to provide a more detailed reason for removal in Parts 1 and 2 of Schedule 10. The purpose of Schedule 10 is to identify the hedgerows for which removal or management is authorised under the Order. The need for removal or management arises from the construction, operation and maintenance of the authorised development, and the specific relationship between the authorised development and the hedgerows proposed for removal or management can be identified from the application documents, including the **Arboricultural Impact Assessment** [APP-242] and the **Hedgerow Regulations and Tree Preservation Orders Removal Plan – Section A Solar Development Area** [APP-026] and the **Hedgerow Regulations and Tree Preservation Orders Removal Plan – Section B** Whether, and to what extent, individual hedgerows are ultimately affected will be determined through the detailed design process within the limits and parameters authorised by the Order. The hedgerows identified in Schedule 10 therefore represent those which may require removal to facilitate the authorised development assessed as part of the Scheme. The Applicant also notes that the approach adopted in Schedule 10 (now Schedule 11) is consistent with recent made solar DCOs. In particular, the Tillbridge Solar Order 2025 includes a similar "purpose of removal" column which identifies the purpose at a comparable level of detail to the Draft DCO. Other recent solar DCOs, including the Green Hill Solar Farm Order 2026, One Earth Solar Farm Order 2026 and Springwell Solar Farm Order 2026, do not include a separate "purpose of removal" column. In the case of the Fenwick Solar Farm Order 2026, hedgerow removal is authorised through an article rather than a dedicated schedule. The Applicant therefore considers that the level of detail currently provided in Schedule 10 (now Schedule 11) is appropriate and consistent with recent precedent.
Q7.5.2	The applicant	**Part 1** Please correct the Hedgerows Regulations and Tree Preservation Order Plan – Section A [APP-026] for:

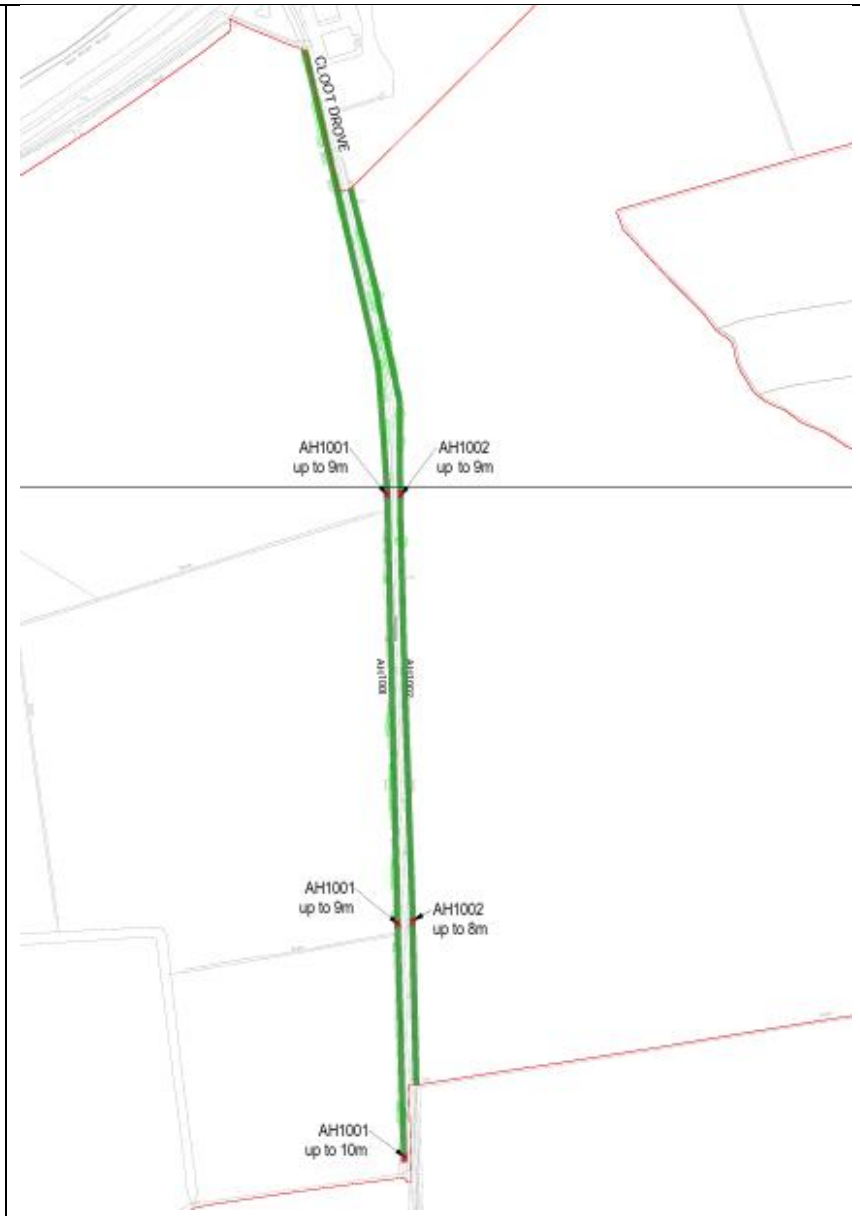
ExQ1	Question to:	Question:
		• Hedgerow AH186 is listed as a hedge to be removed. This is not labelled. • Hedgerow AH1017 is listed as a hedge to be removed. This is not labelled. • Hedgerow AH1014 is listed as a hedge to be removed however it is only shown to the overhead line. • Hedgerow AH1009 is listed as removal of 423m, which runs along Hardy's Lane. This does not correlate with the plan which shows a smaller hedge. • Hedgerow AH1001 is listed as a hedge to be removed. This is not labelled. • Please confirm what the green triangles represent.
		The Applicant notes the queries from the Examining Authority and provides responses for each point raised below. The label for Hedgerow AH186 is included in the **Hedgerow Regulations and Tree Preservation Orders Plan - Section A Solar Development Area** [APP-026] on Sheet 7 as shown in the cropped image of the plan below.

ExQ1	Question to:	Question:
		 The label for Hedgerow AH1017 is included in the **Hedgerow Regulations and Tree Preservation Orders Plan - Section A Solar Development Area** [APP-026] on Sheet 7 as shown in the cropped image of the plan below.

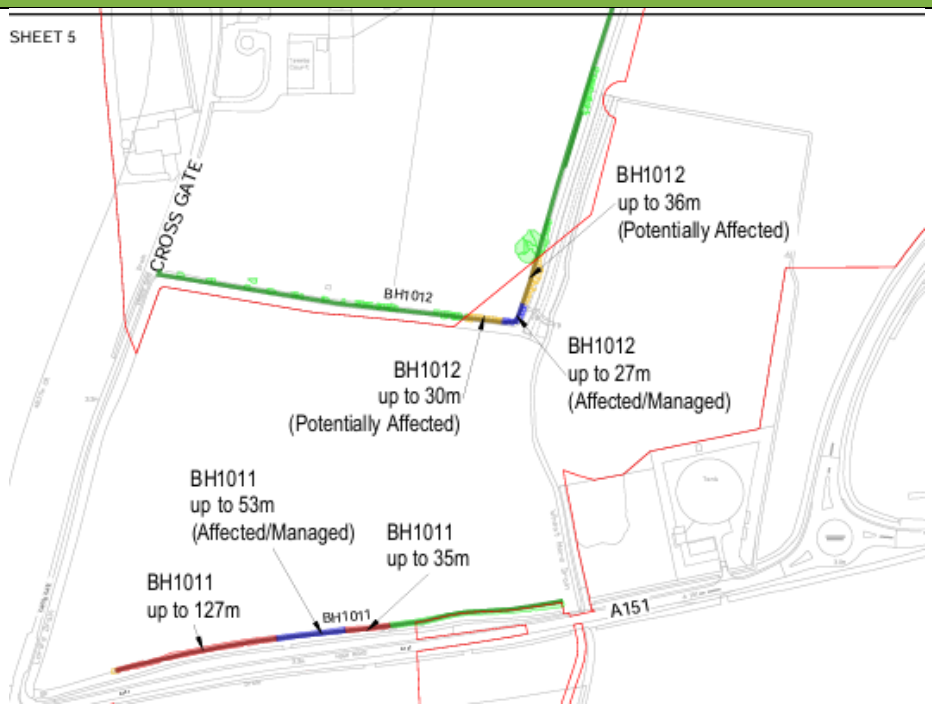
ExQ1	Question to:	Question:
		 One section of hedgerow AH1014 is proposed to be removed and is shown in the **Hedgerow Regulations and Tree Preservation Orders Plan - Section A Solar Development Area** [APP-026] on Sheet 7 as shown in the cropped image of the plan below.

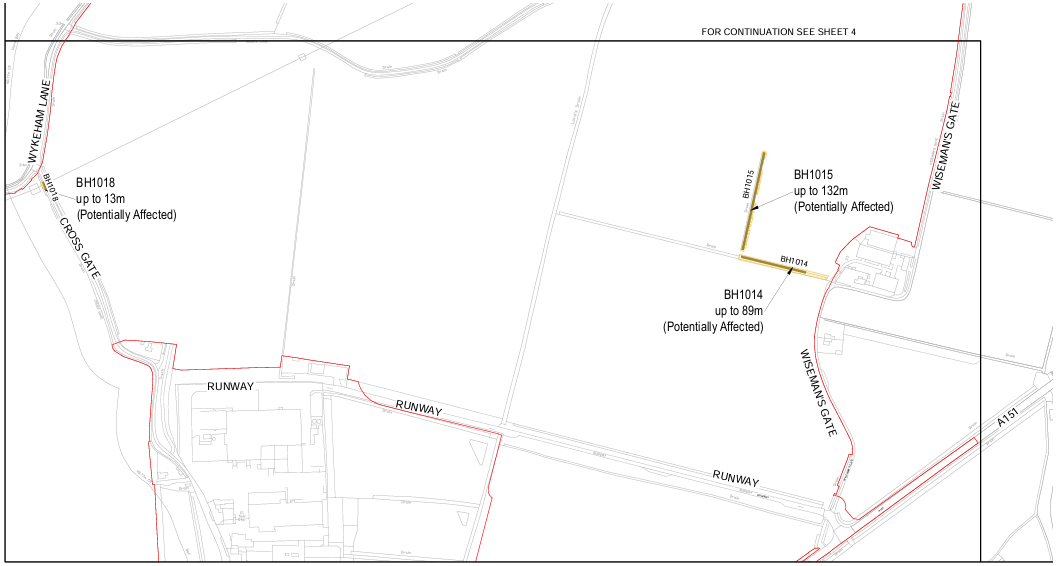
ExQ1	Question to:	Question:
		 Hedgerow AH1009 is listed as removal of 423m both in Schedule 10 of **Draft DCO** (Doc Ref 3.1 Rev 3) and **Hedgerow Regulations and Tree Preservation Orders Plan - Section A Solar Development Area** [APP-026] Sheet 5 and Sheet 6 as shown in the cropped image of the plan below.

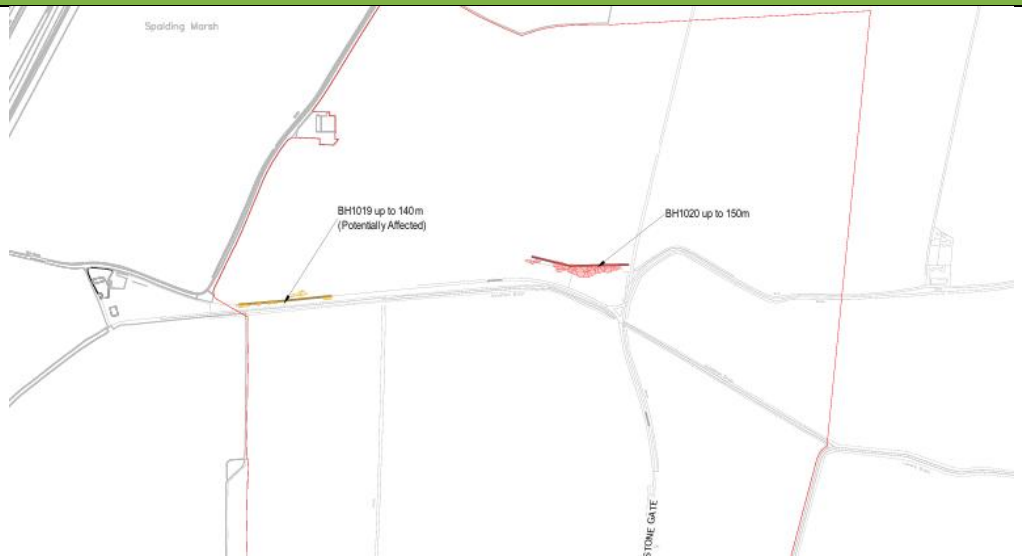
ExQ1	Question to:	Question:
		 The label for Hedgerow AH1001 is included in the **Hedgerow Regulations and Tree Preservation Orders Plan - Section A Solar Development Area** [APP-026] on Sheet 1 and Sheet 2 as shown in the cropped image of the plan below.

		CLOOT DROVE AH1001 up to 9m AH1002 up to 9m AH1001 AH1002 AH1001 up to 9m AH1002 up to 8m AH1001 up to 10m

ExQ1	Question to:	Question:
		The Applicant is unable to identify any feature described as "green triangles" on the relevant plan. All green features shown on the plan are identified and explained within the accompanying legend. If the ExA is referring to a specific feature or location, the Applicant would welcome further clarification and will provide a more detailed response.
Q7.5.3	The applicant	**Part 2** Hedgerow BH1012 is listed as a hedge to be affected and managed for 27m. This is not labelled on the Hedgerows Regulations and Tree Preservation Order Plan – Section A [APP-026] sheet 4 or is the remainder of the hedge coloured orange as potentially impacted. It is unclear which hedge is impacted.
		The Applicant notes that, in Schedule 10 (Part 2) and Schedule 10 (Part 3) of the **Draft DCO** (Doc Ref 3.1 Rev 3), hedgerow BH1012 is incorrectly stated to be shown on Sheet 5 of the **Hedgerow Regulations and Tree Preservation Orders Plan – Section B Grid Connection** [APP_027]. The Applicant can confirm that hedgerow BH1012 is shown on Sheet 4 of the **Hedgerow Regulations and Tree Preservation Order Removal Plan Section B [APP-027]**. The Draft DCO has therefore been updated at Deadline 3 to correct this error and amend the references from **Sheet 5** to **Sheet 4**. The Applicant can also confirm that hedgerow BH1012 is marked on Sheet 4 using orange and blue shading to differentiate the sections requiring management and the sections requiring removal or management. A cropped extract of the plan is included below for ease of reference.

ExQ1	Question to:	Question:
		
Q7.5.4	The applicant	**Part 3** Hedgerow BH1018 is listed as a hedge to potentially be affected. This is not labelled on the Hedgerows Regulations and Tree Preservation Order Plan – Section A [APP-026] and is classified as unsurveyed. Please confirm how the quality is therefore known and why it is not labelled on the plan. This is the same for hedgerows BH1015 and BH1019.
		Removal or management of one section of hedgerow BH1018 within the Order Limits, measuring up to 13m in length, is shown on the **Hedgerow Regulations and Tree Preservation Orders Plan – Section B Grid Connection** [APP_027] Sheets 4 and 5, and a cropped image of the plan is included

ExQ1	Question to:	Question:
		below for reference. BH015 is also shown **Hedgerow Regulations and Tree Preservation Orders Plan – Section B Grid Connection** [APP_027] Sheets 4 and 5, and in the cropped image below.  Removal or management of one section of hedgerow BH1019 within the Order Limits, measuring up to 140m in length, as shown approximately on the **Hedgerow Regulations and Tree Preservation Orders Plan – Section B Grid Connection** [APP_027] [APP-027] Sheet 5 of 5.

ExQ1	Question to:	Question:
		

Schedule 11 – Documents and plans to be certified

2.7.7. The below table sets out the Applicant's response to the ExA's written questions relating to Schedule 11 – Documents and plans to be certified.

Table 2.7-7: Schedule 11 – Documents and plans to be certified

ExQ1	Question to:	Question:
Q7.6.1	The applicant	**Part 1** Please include the 'Outline archaeological mitigation and management strategy' in part 1 of schedule 11. Additionally, the ExA requests that schedule 11 is divided into the following four parts: • Part 1 – documents forming the environmental statement to be certified

ExQ1	Question to:	Question:
		• Part 2 – examination documents forming part of the environmental statement to be certified • Part 3 – other documents to be certified • Part 4 – substitute and supplementary documents
		The 'Outline archaeological mitigation and management strategy' has been added to part 3 of schedule 11 in the **Draft DCO** (Doc Ref. 3.1 Rev 3) submitted at Deadline 3. Schedule 11 has also been divided into the four parts, as requested.

Schedule 13 – Protective Provisions

2.7.8. The below table sets out the Applicant's response to the ExA's written questions relating to Schedule 13 – Protective Provisions.

Table 2.7-8: Schedule 13 – Protective Provisions

ExQ1	Question to:	Question:
Q7.7.1	All Statutory Undertakers	**Acquisition of Statutory Undertakers' Land** Paragraph 6.3.6 of the SoR [APP-032] states that adequate protection for statutory undertakers will be included within protective provisions in the dDCO [REP1-006]. Meridian Solar Farm Limited therefore considers that statutory undertakers will not suffer serious detriment to the carrying on of the undertaking as a result of the compulsory acquisition of land or rights over land or powers of temporary possession. For those statutory undertakers who have been sent the draft protective provisions but have not confirmed agreement, please explain why these protective provisions are not considered to provide adequate protection and why Meridian Solar Farm Limited considers that the land and rights can be acquired without serious detriment to the carrying on of the undertaking.

Schedule 14 – Procedure for discharge of requirements

2.7.9. The below table sets out the Applicant's response to the ExA's written questions relating to Schedule 14 – Procedure for discharge of requirements.

Table 2.7-9: Schedule 14 – Procedure for discharge of requirements

ExQ1	Question to:	Question:
Q7.8.1	The applicant	**Appeals** Under paragraph 4(2)(a) should a time period be specified within which the undertaker can make an appeal?
		The Applicant agrees that a defined appeal period would provide additional clarity. Accordingly, the draft DCO has been updated at Deadline 3 to provide that any appeal under Schedule 14 must be made within 42 days of the relevant decision or determination. The 42-day period is consistent with the approach adopted in the Green Hill Solar Farm Order 2026, the One Earth Solar Farm Order 2026, the Springwell Solar Farm Order 2026, and the Tillbridge Solar Order 2025.

Controlling Documents for the dDCO

2.7.10. The below table sets out the Applicant's response to the ExA's written questions relating to Controlling Documents for the dDCO.

Table 2.7-10: Controlling Documents for the dDCO

ExQ1	Question to:	Question:
Q7.9.1	The applicant	**Schedule of Other Consents and Licences**

ExQ1	Question to:	Question:
		Within the Schedule of Other Consents and Licences [APP-030], there are a number of additional consents required which have not yet been applied for. Has any progress been made towards applying for or obtaining these and if not, why not?
		The **Schedule of Other Consents and Licences** [APP-030] identifies a number of consents which, by their nature, are not required until after the DCO has been made and/or immediately prior to construction commencing. Accordingly, these consents have not yet been applied for, as the detailed information necessary to support the applications will be developed during detailed design and construction planning. The Schedule explains the anticipated timing for each consent and confirms that the Applicant is not aware of any impediment to obtaining them. Many of the consents identified are also expected to be secured by the principal contractor or other delivery parties at the appropriate stage of the Scheme, including (for example) water resource licences, water discharge permits, abnormal load permits, health and safety related consents and utility connection consents. These are therefore appropriately progressed post-consent and prior to the relevant works being undertaken. The exception is the Bilateral Connection Agreement (BCA) with the National Energy System Operator. The Applicant is unable to progress this further at present because the BCA can only be entered into following receipt of the relevant Gate 2 offer. Until that stage is reached, there is no opportunity to apply for or obtain the BCA. The Applicant will continue to progress all necessary consents and licences in accordance with the programme set out in the Schedule of Other Consents and Licences.
Q7.9.2	The applicant	**Side Agreements and Legal Agreements** If applicable, please set out which local authorities, statutory undertakers or IPs are being engaged in either side agreements or legal agreements pursuant to s106 of the Town and Country Planning Act 1990. Give a broad overview of what is sought to be achieved within these agreements.

ExQ1	Question to:	Question:
		The Applicant is not currently proposing to enter into any agreements pursuant to section 106 of the Town and Country Planning Act 1990. In relation to side agreements, the Applicant is continuing to engage with a number of statutory undertakers and other affected parties regarding the acquisition of land rights and associated private agreements. Details of the parties with whom discussions are ongoing are set out in the **Land Rights Tracker** [REP1-012]. The specific terms and subject matter of any side agreements are commercially confidential and subject to ongoing negotiations between the relevant parties. As such, the Applicant is not in a position to provide an overview of the matters being agreed. The purpose of such agreements is, however, generally to regulate the relationship between the Applicant and the relevant party in connection with the Scheme and, where appropriate, to facilitate the delivery of the powers sought through the **Draft DCO** (Doc Ref. 3.1 Rev 3). The Applicant will continue to progress discussions with the relevant parties throughout the Examination, and update the ExA on progress accordingly.

2.8. Air Quality

2.8.1. The below table sets out the Applicant's response to the ExA's written questions relating to air quality.

Table 2.8-1: Air quality

ExQ1	Question to:	Question:
Q8.0.1	The applicant	**Decommissioning phase** Paragraph 6.4.24 of ES Chapter 6: Air Quality [APP-057] states the decommissioning period is expected to be shorter in duration but similar in nature to the construction phase and could be phased with a lower intensity of work with fewer road trips. Please explain how the decommissioning phase could be phased to result in a lower intensity of work, but the construction phase seemingly cannot be. Also explain how the decommissioning phase would result in fewer road trips if it is of a similar nature to the construction phase.
		The assessment presented within **ES Chapter 6: Air Quality** [APP-057] assumes on a precautionary basis that the effects of the decommissioning phase are broadly similar to those identified for construction and has not assumed a phased decommissioning programme to determine the effects. Whilst paragraph 6.4.24 refers to the decommissioning period being shorter and that it could be phased, this context has been included within **ES Chapter 6: Air Quality** [APP-057], in order to explain that the assessment is precautionary. It has not been used to reduce effects as a result. The construction phase will include site mobilisation and set up, earthworks to provide a suitable base for the panels, and extensive commissioning work to ensure panels, Battery Energy Storage System (BESS) and switchgear are all operating correctly. Decommissioning would not require this work, and earthworks are expected to be much more limited to return the Site to its current condition (e.g. removal of buried services and regrading of ground level). The result is that the decommissioning phase is expected to take less time and has more flexibility in phasing of the works such as working in smaller areas, working in non-adjoining areas, or completing decommissioning works in one area before moving to another.

ExQ1	Question to:	Question:
		Inherently, the decommissioning phase is shorter; it takes less time to remove infrastructure than it does to install it. During construction, deliveries to Site are expected to include pre-fabricated elements which will require careful handling to avoid damage (e.g. panel supports). During decommissioning, fewer HGVs are needed, as it is expected that some of these pre-fabricated elements can be dismantled or cut up on site, decreasing the number of vehicle trips required to remove the same amount of material from Site. There is also less packaging of components, such as solar PV and steel tables (they are not repackaged to avoid damage – they can be recycled irrespective), and therefore vehicles are packed more efficiently than during construction.
Q8.0.2	The applicant	**Air quality general** Paragraph 6.8.3 of ES Chapter 6 [APP-057] states the assessment considers the potential risk across a set of predefined zones as shown on ES Figure 6-1 [APP-091]. Figure 6-1 does not present this but merely breaks the proposal down by area. Please clarify this disparity and provide an updated figure if necessary.
		It is acknowledged that Paragraph 6.8.3 does refer to zones (plural) and this is a typographical error. The start of the last sentence should replace 'These zones are' with 'This zone is'. For the purpose of clarity, these zones are set as <20m, <50m, <100m and <250m from the Order Limits and are set out in guidance published by the IAQM[3]. The assessment has considered the number of receptors within each distance zone to determine the sensitivity of the area to human health, dust soiling (amenity) and ecological effects. The assessment does not consider individual

[3] Institute of Air Quality Management (2024) Guidance on the Assessment of Dust from Demolition and Construction. Available at: https://iaqm.co.uk/wp-content/uploads/2013/02/Construction-Dust-Guidance-Jan-2024.pdf [Accessed 17/10/2026]

ExQ1	Question to:	Question:
		properties, as the specified control measures should provide equal protection to all offsite sensitive receptors. **ES Figure 6-1** [APP-091] shows the Construction Dust Study Area up to a distance of 250m from the Order Limits which encompasses all sensitive receptors. The figure has been produced to provide the reader with a sense of scale of 250m from the Order Limits, with an overview of the number of sensitive receptors within this distance. The inclusion of the inner zones on the figure would not provide any additional information for the purpose of the assessment, and no update to the figure is considered to be necessary.
Q8.0.3	The applicant	**Dust** Paragraph 6.8.10 of ES Chapter 6 [APP-057] states that given the area of earthworks is small, alongside there not being heavy earth moving vehicles with a small stockpile, the dust emission magnitude has been categorised as small. Please explain how this statement and conclusion align with the use of tracked excavators, compactors, dozers and dumpers, all being heavy earth moving vehicles as listed within appendix 13-3 [APP-246].
		Criteria for defining dust emission magnitudes are set out in the IAQM guidance on construction dust[3]. A dust emission magnitude of 'Small' is used where it is anticipated that there will be less than five heavy earth moving vehicles in operation at any one time. Although it is acknowledged that there will be some heavy earth moving vehicles in use, it is considered that there would not be more than five in operation at any one time within each construction area or field. Where multiple construction areas or fields are in development at the same time, construction activities would be spread out across the Site, further limiting the dust generation potential. As stated in **ES Appendix 13-3 Construction and Operational Noise Modelling Report** [APP-246], the Noise Assessment assumes all plant within each phase are operating concurrently as a conservative assessment. The prediction of construction noise is therefore likely to be an

ExQ1	Question to:	Question:
		overestimate. This does not align with Paragraph 6.8.10 of **ES Chapter 6** [APP-057], as the assumptions used are specific to each assessment.
Q8.0.4	The applicant	**Emission factor** Paragraph 6.5.5 of ES Chapter 6 [APP-057] refers to an emission factor toolkit to represent the average of vehicles from the fleet and to model background pollutant concentrations. Please confirm which emission factor toolkit has been used and its date.
		The details of the modelling inputs are set out in **ES Appendix 6-2: Quantitative Road Traffic Emissions Assessment Methodology** [APP-177]. The appendix states that version 13.0 has been used, however, it is confirmed that the assessment has used EFT v13.1. As per the EFT v13.1 User Guide published by Defra, there is no difference between v13.0 and v13.1 in terms of the output, and the only change relates to the optimisation of the model run time.

2.9. Biodiversity, Ecology and Natural Environment (Environment Impact Assessment Only)

2.9.1. The below table sets out the Applicant's response to the ExA's written questions relating to biodiversity, ecology and natural environment (Environment Impact Assessment only).

Table 2.9-1: Biodiversity, ecology and natural environment (Environment Impact Assessment only)

ExQ1	Question to:	Question:
Q9.0.1	Lincolnshire County Council Lincolnshire Wildlife Trust Natural England	**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.
Q9.0.2	Lincolnshire County Council Lincolnshire Wildlife Trust Natural England	**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? • 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.

ExQ1	Question to:	Question:
		• 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.
Q9.0.3	Lincolnshire County Council Lincolnshire Wildlife Trust Natural England	**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?
Q9.0.4	The applicant	**Maintenance of Biodiversity Net Gain** Government guidance 'Biodiversity net gain: nationally significant infrastructure projects' (August 2026) states that 'If your development is going to operate longer than 30 years, you should continue to maintain the habitat for at least the whole period of operation'. Although this application predates the mandatory NSIP Biodiversity Net Gain (BNG) regime, this guidance has the potential to be important and relevant. Given the proposed development's 40-year operational life, please consider whether the reference to a minimum period of 30 years [REP1-070] should be updated in accordance with this guidance.

ExQ1	Question to:	Question:
		BNG guidance for NSIPs[4] stipulates 30 years being the appropriate maintenance period to be legally secured but recognises maintenance should occur for the duration of operation. By Year 30 the habitat will be well established and as such, maintenance requirements would be limited. This would remain the case if years 30-40 are also included and therefore, the current 'minimum period of 30 years' remains appropriate. Maintenance up to the 40-year mark would align with the confirmed individual habitat 'Long Term Maintenance' activities stated within the **OLEMP** (Doc Ref. 7.16 Rev 2).
Q9.0.5	The applicant	**Environmental net gain statement** NPS EN-1 paragraph 4.6.15 requires that applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project. It is noted that the Design Approach Document [APP-268] and Biodiversity Net Gain Report [REP1-059] address enhancement, in addition to other environmental matters being addressed in individual ES chapters. It would assist the ExA if a statement could be submitted that expressly demonstrates how opportunities for delivering environmental net gains have been considered.
		The **Design Approach Document** [APP-268] provides an overview of the design principles the Scheme's design has followed which included identifying opportunities for environmental benefits and enhancements. Further description of the design objectives and actions undertaken to align with these principles is provided within Table 3-4 of **ES Chapter 3: Alternatives and Design Evolution** [APP-054].

[4] DEFRA (2026). Biodiversity net gain: nationally significant infrastructure projects, Available at: https://www.gov.uk/guidance/biodiversity-net-gain-nationally-significant-infrastructure-projects [Accessed 22/10/2026]

ExQ1	Question to:	Question:
		In summary, the environmental net gains of the Scheme would be derived from the residual beneficial effects identified within the ES. These include: • A significant beneficial effect with regards to the provision of renewable energy and the decarbonisation of the electricity network (refer to **ES Chapter 7: Climate Change** [APP-058]; • A minor beneficial effect with regards to the creation of hedgerows and lines of trees, significant on a local scale, and moderate beneficial (significant) effects with regards to the enhancement of habitats for protected species (such as badger, barn owl, breeding and wintering birds, bats, reptiles, otter and water vole) (refer to **ES Chapter 9: Ecology and Biodiversity** [REP1-018] and the **Biodiversity Net Gain Report** [REP1-059]). • Minor beneficial effect (not significant) to the soil resource within the Solar Development Area through an increase in soil organic carbon over the operational period of the Scheme, with the temporary removal of the land from agricultural production (refer to **ES Chapter 5: Agriculture and Soils** [REP1-014]); • Minor beneficial effect (not significant) with regards to the provision of employment and increased spending for local economy during construction and decommissioning (refer to **ES Chapter 14: Socio-Economics and Land Use** [APP-065]); and • Minor beneficial effect (not significant) from the provision of a permissive path, with regards to access to PRoW and active travel for the general population and vulnerable groups (refer to **ES Chapter 10: Human Health** [APP-061]). The permissive path will also incorporate opportunities for the provision of the information boards on the historic and natural environment, as secured through the **OLEMP** (Doc Ref. 7.16 Rev 2). Whilst some of these beneficial effects form an inherent part of the Scheme (e.g. provision of renewable energy and the recovery of soil organic carbon, with the temporary long-term restriction to agricultural production in the Solar Development Area), the Applicant has sought to further maximise the remaining benefits of the Scheme, including through the habitat establishment and

ExQ1	Question to:	Question:
		maintenance measures included within the **OLEMP** (Doc Ref. 7.16 Rev 2), and the application of the **OSSCEP** (Doc Ref. 7.17 Rev 2). The alignment of the permissive path has been defined to maximise the benefits that it could deliver, including connecting up existing unconnected PRoWs and opening up the Settlement W (west) of Cate's Cove Corner Scheduled Monument to the local community, in addition to providing a new recreational walking opportunity.
Q9.0.6	The applicant	**Environmental Improvement Plan** Paragraph 5.4.40 of the NPS EN-1 states that the Secretary of State should have regard to the aims and goals of the government's Environmental Improvement Plan. It would assist the ExA if the applicant could explain how the proposals have had regard to the environmental goals in the government's Environmental Improvement Plan.
		The Environmental Improvement Plan[5] (EIP) can be distilled down to ten overarching goals. These are set out below together with details of how the Scheme's proposals have had regard to them: • Restored Nature: The Scheme incorporates measures to protect and enhance biodiversity, including the provision of habitats and ecological features through the landscape and ecological design. The proposed ecological mitigation and enhancement measures are set out in **ES Chapter 9: Ecology and Biodiversity** [REP1-018] and the **OLEMP** (Doc Ref. 7.16 Rev 2). The Scheme's biodiversity proposals have been informed by the ecological baseline, the assessment of potential effects and the opportunities available to create and improve habitats within the Order Limits. These measures contribute to the EIP's objective of restoring nature and improving habitat connectivity and resilience.

[5] Department for Environment, Food & Rural Affairs (2025). Environmental Improvement Plan 2025. Published 1 December 2025. Available at: Environmental Improvement Plan 2025 - GOV.UK. Accessed 15.10.2026.

ExQ1	Question to:	Question:
		• Achieve Clean Air: The Scheme has considered potential effects on air quality during construction, operation and decommissioning through the assessment presented in **ES Chapter 6: Air Quality** [APP-057]. Construction-phase controls, including the management of dust and emissions, will be implemented through the **OCEMP** (Doc Ref. 7.10 Rev 3). In addition, the generation of renewable electricity will contribute to the transition away from fossil-fuel-based electricity generation and support wider decarbonisation objectives. • Achieve Clean and Plentiful Water: The Scheme has been designed with consideration of the protection of surface water and groundwater resources, water quality, drainage and flood risk. **ES Chapter 11: Hydrology and Flood Risk** [REP1-020] and **ES Appendix 11-4: Outline Drainage Strategy** [APP-277] set out the assessment and proposed drainage approach. The Scheme also provide construction-phase environmental controls through the **OCEMP** (Doc Ref. 7.10 Rev 3), including associated water and silt management procedures. These measures are intended to manage runoff, prevent pollution and avoid or reduce adverse effects on the water environment, consistent with the EIP's objectives for clean and plentiful water. • Minimise risks from chemicals and pesticides: The Scheme's environmental management measures provide a framework for controlling the storage, handling and use of potentially polluting substances during construction and operation, and for managing the risk of accidental releases. The **OCEMP** (Doc Ref. 7.10 Rev 3) and associated management procedures will establish controls for the management of pollution risks and the protection of the surrounding environment. • Minimise Waste: The Scheme includes an **Outline Site Waste Management Plan** (OSWMP) [APP-285], which establishes the framework for managing waste generated during construction. The **OOEMP** (Doc Ref. 7.11 Rev 2) sets out that the detailed OEMP will include measures to manage operational waste. The approach supports the application of the waste

ExQ1	Question to:	Question:
		hierarchy, including the avoidance and reduction of waste, reuse of materials where practicable, and appropriate recovery and disposal. These measures will help to minimise waste generation and the use of virgin resources, in accordance with the EIP's circular economy objectives. • Sustainable management and consumption of natural resources: The Scheme has considered the use and protection of natural resources, including agricultural land and soil. The **Outline Soil Management Plan** (OSMP) (Doc Ref. 7.14 Rev 2) provides the framework for managing soils during construction and reinstatement, with the objective of protecting soil resources and supporting their appropriate restoration. • Reduce Greenhouse Gas (GHG) Emissions: The Scheme will generate renewable electricity and thereby contribute to the decarbonisation of the electricity system. **ES Chapter 7: Climate Change** [APP-058] concludes that the Scheme will have a significant, beneficial effect on GHG emissions. Its design and environmental assessment have also considered climate change and relevant resilience issues, including the effects of climate change on flood risk and the water environment. The assessment and proposed measures are presented in **ES Chapter 11: Hydrology and Flood Risk** [REP1-050]. • Reduce Environmental Hazards: The Scheme has considered environmental hazards, including flood risk, pollution incidents and risks arising during construction and operation. **ES Appendix 11-3: Flood Risk Assessment** [REP1-050] and **ES Appendix 11-4: Outline Drainage Strategy** [APP-277] identify the measures proposed to manage surface water and flood risk, while the **OCEMP** (Doc Ref. 7.10 Rev 3) provides the framework for construction-phase environmental controls and emergency response procedures. • Enhance Biosecurity: The Scheme's ecological management measures provide for the appropriate management of habitats and vegetation, including the control of invasive species. The **OCEMP** (Doc Ref. 7.10 Rev 3) outlines measures for the protection of habitats, including

ExQ1	Question to:	Question:
		avoidance of spills, silting, and containment of invasive non-native species. This approach is consistent with the EIP's objective of protecting ecosystem health and resilience. • Ensure Access to Nature: The Scheme's landscape and ecological design has considered opportunities for environmental enhancement and for maintaining or improving access to the surrounding countryside, where compatible with the Scheme's design and other environmental constraints. The **Outline Public Rights of Way Management Plan** (Doc Ref. 7.15 Rev 2) provides the framework for managing public rights of way affected by construction activities. Furthermore, a permissive path would be provided connecting PRoWs between Queens Bank and Shepeau Stow, following the boundary of the Settlement W of Cate's Cove Corner Scheduled Monument. The permissive path would be located within a corridor that measures approximately 20m in width. The width of the permissive path is subject to detailed design, but is anticipated to be up to 5m wide to provide space for pedestrians, cyclists and horse riders. The corridor also includes space for landscaping and for the provision of information boards on the historic and natural environment. The indicative alignment of the permissive path is shown on **ES Figure 2-2: Illustrative Solar Development Area and Inter-Array Connections Layout Plan** (Doc Ref. 6.2 Rev 2). As demonstrated by the response to each of those goals, the Scheme has appropriate regard to the Environmental Improvement Plan 2025.
Q9.0.7	The applicant	**Habitat connectivity** The solar development area would include a significant length of deer-wire mesh and wooden-post security fencing up to 2m height [REP1-055] and the substations and compounds would be surrounded by fencing up to 3m high. Please signpost where the approximate total length and final layout of fencing (or other forms of barrier to movement such as bunding) during both construction and operation are set out.

ExQ1	Question to:	Question:
		The proposed mitigation measures for the effects of fencing on mammal movement [REP1-061], [REP1-074] are noted. However, given that it is proposed to specify the fencing at the detailed design stage, the final effects on wildlife remain uncertain. Please provide a more detailed assessment about the potential effects on ecology, including protected species and deer, and consider whether there is a need to commit to permeability measures.
		ES Figure 2-2: Indicative Solar PV Area and Inter Array Area (Doc Ref. 6.2 Rev 1) and **ES Figure 2-4: Indicative Grid Connection Route Layout Plan** [APP-076] set out the indicative layout of fencing during the operational phase. The length of operational fencing in the Solar Development Area is approximately 69km. The length of operational fencing in the Grid Connection Route is approximately 368m and is associated with the CSECs. During the construction phase, the length of fencing within the Solar Development Area would be the same as that during the operational phase. Within the Grid Connection Route, the length of fencing during construction around the construction compounds would be approximately 1,640m. There may be additional, limited fencing around individual bellmouths and individual pylon working areas whilst they are under construction. This, along with the final total length of fencing will be subject to detailed design. There is no intention to erect a fence along the entire length of the Grid Connection Route or the Inter-Array Connections. Mammal gates will be included within the security fencing, in accordance with the **OCEMP** (Doc Ref. 7.10 Rev 3). This is with the exception for substations/ CSECs / construction compound areas, where access needs to be avoided for safety reasons. The specific details of the mammal gates remain subject to detailed design, however, they are likely to be approximately 300mm x 150mm (length x height) in size and spaced approximately every 200m which would equate to 345 mammal gates at the Solar Development Area. The only operational fencing in the Grid Connection Route is associated with CSECs, where mammal gates would not be provided for safety reasons. The positioning of the mammal gates will also be determined by the locations of existing mammal

ExQ1	Question to:	Question:
		runs/walkways where present (at that time) thereby also allowing targeted positioning and subsequent continued navigation along these set routes. The stock proof fencing will be a wire fence that sits low to the ground with a small gap, it will therefore still be possible for small mammals to range/forage without any constraint to their passage. Ongoing foraging is still considered possible given these reasons. There are no fencing options that allow unrestricted deer movement whilst also maintaining security requirements. The construction/fence installation activities themselves should deter deer from entering the work areas and thereby avoiding becoming trapped. The timing and phasing of the security fencing will be determined at detailed design to prevent trapping any deer within the fencing. Deer will however continue to have access to areas in between fields during operation. Annex A Outline Landscape Masterplans provided within the **OLEMP** (Doc Ref. 7.16 Rev 2) shows where landscape corridors have been provided through Solar Development Area parcels, rather than the entirety of the parcels being fenced off. Fragmentation was assessed within the **ES Chapter 9: Ecology and Biodiversity** [REP1-018] specifically, the construction phase assessment of potential impacts and likely significant effects. Fragmentation was identified to be of minor adverse (temporary/localised, not significant) effect.
Q9.0.8	The applicant	**Ornithological surveys – vantage points** ES Appendix 9-10: Vantage Point Survey Report [APP-213] refers to 5 viewpoints in table 2.2. However, only 3 are shown on figure A1.1. Update this figure to include viewpoints 3 and 5.
		Figure A1.1 of **ES Appendix 9-10: Vantage Point Survey Report** (Doc Ref. 6.3 Rev 1) has been updated at Deadline 3 to show all five viewpoints.

2.10. Climate Change

2.10.1. The below table sets out the Applicant's response to the ExA's written questions relating to climate change.

Table 2.10-1: Climate change

ExQ1	Question to:	Question:
Q10.0.1	The applicant	**Lifecycle greenhouse gas assessment** Section 5.3 of NPS EN-1 states that all energy infrastructure projects should include a Greenhouse Gas (GHG) Assessment and provides details of what this should contain. The purpose of this is to allow the Secretary of State to be satisfied that the applicant has assessed the GHG at all stages and that all reasonable steps have been taken to reduce emissions (paragraphs 5.3.8 and 5.3.9). Please signpost where the following can be found or provide this information: • How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures. • How operational emissions have been reduced as much as possible through the application of Best Available Technique (BAT) for that type of technology. • Whether and how any residual GHG emissions will be offset or removed. • Where opportunities have been looked for within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions. • Where a GHG Reduction Strategy can be found. If this not available, please provide one or justify why this is not necessary. The ExA note that the project would contribute 2.1% of the electrical supply sectoral carbon budget in the ninth carbon budget. • Is this considered to be significant? If not, why not?

ExQ1	Question to:	Question:
		• Should this be incorporated in an assessment of cumulative effects for the ninth carbon budget for the electricity supply sector? If not, why not?
		Operation Energy Demand and Reductions Operational energy represents 0.3% of the Whole Life Carbon and 0.5% of operational stage emissions associated with the Scheme as displayed in Table 7-18 of **ES Chapter 7: Climate Change** [APP-058]. The GHG assessment has conservatively estimated that the energy required to operate the solar farm will be 1% of the energy generated, noting that the marginal carbon intensity of this energy is effectively zero during normal operations. It is considered that operation of the Scheme will employ best practice energy efficiency measures to maximise potential output to the grid. Energy requirements for the Scheme are expected to be minimal, with emissions associated with operational energy considered immaterial in respect to the whole-life emissions associated with the Scheme as a whole. **Application of Best Available Techniques (BAT)** Consideration of BAT for Scheme's components would be subject to detailed design. At this stage, the Scheme does not fix the type or design of components to allow flexibility for technological advancements to be incorporated within the design post-consent. The GHG assessment presented within **ES Chapter 7: Climate Change** [APP-058] is based on conservative assumptions to represent a worst-case assessment. **Residual Emissions** Unavoidable residual emissions are expected to occur during the Scheme's lifetime. The majority of these emissions are reported to occur during operation. In reality, the magnitude of these residual emissions are anticipated to be much lower, with a high confidence that the supply chain for solar

ExQ1	Question to:	Question:
		PV panels and BESS will continue to decarbonise into the future with each replacement cycle providing panels with lower embodied carbon, increased efficiency and longer design lifespans. As explained within paragraph 7.9.3 of **ES Chapter 7: Climate Change** [APP-058], the GHG reductions achieved as a result of the operation of the Scheme itself adequately outweigh and offset the GHG impacts during the individual lifecycle stages, which have been calculated within the GHG assessment on a precautionary basis. **Nature-based or Technological Solutions to Mitigate or Offset Emissions** Additional technological or nature-based solutions are not considered necessary to offset the minimal operational energy emissions and no additional offsetting measures are proposed. However, as stated in the **Biodiversity Net Gain Report** [REP1-059], paragraph 5.3.3, it is possible to deliver a net gain in biodiversity on-site. **GHG Reduction Strategy** A standalone GHG reduction strategy has not been prepared for this Scheme, instead the GHG assessment, embedded mitigation (Section 7.7) and discussion of Overall GHG Impact (Paragraphs 7.8.32 to 7.8.43) within **ES Chapter 7: Climate Change** [APP-058] are considered to address how GHG emissions have been minimised for the lifespan of the Scheme and how the Scheme will provide a net GHG benefit due to the displacement of higher carbon electricity. **Power Sector Carbon Budgets** The 2.1% figure has been provided in error due to comparing five years of operational emissions against the 9th Carbon Budget, while that budget period is only three years. The corrected figure is 1.26% of the energy budget. As this is a less adverse figure, it is not considered to alter any assessment conclusions presented within the chapter. While this may still appear large, these emissions have been included in the assessment against UK budgets as an extremely conservative estimate. In reality, the majority of these emissions (manufacture and transport) will occur outside

ExQ1	Question to:	Question:
		the boundary of the UK, and therefore fall outside the scope of national carbon budgets. Additionally, this assessment has assumed no decarbonisation of the supply chain. In reality, emissions associated with the manufacture and transport of Scheme components is likely to decrease over time. Due to the non-geographically constrained nature of GHG emissions, it is not considered appropriate to cumulatively assess emissions associated with this and other energy generation schemes. UK carbon budgets have been used as a proxy receptor, in place of the global climate, to contextualise the expected magnitude of the Scheme's whole life emissions, rather than a indicator of significance. Additionally, reported emissions related to this Scheme are not necessarily within the scope of the energy sector budget as this primarily considers fuel use within electricity generation, and emissions associated with the Scheme are dominated by the manufacture and supply of materials and components. As the manufacture of components is expected to occur internationally, this would not fall within the geographical constraints of the UK carbon budgets.
Q10.0.2	The applicant	**Assumptions in the lifecycle greenhouse gas assessment** Paragraph 7.4.9 (ES Chapter 7: Climate Change [APP-058]) states that the baseline identifies current sources and sinks of GHG emissions in line with Institute of Sustainable and Environmental Professionals (ISEP) guidance. Can the applicant: • Signpost where this information can be found. If it is not available, please provide this. • This should include a response to lichen within the OL acting as a carbon sink [RR-186]. Table 7-2 [APP-058] lists the sources of GHG emissions. Paragraph 7.4.21 states that, where activity data allow, expected GHG emissions have been quantified following the UK Government conversion factor methodology and where this has not been possible, a qualitative approach has been taken. Can the applicant:

ExQ1	Question to:	Question:
		• Set out where a qualitative approach has been applied and how this has been incorporated in the lifecycle GHG assessment. The Lifecycle GHG Assessment (ES Chapter 7: Climate Change [APP-058]) assumes that the construction phase lasts four years, starting in 2029 (paragraph 7.8.4). There is uncertainty around the commencement date, in part relating to the availability of a grid connection. Can the applicant: • Explain the implications of a 'latest' commencement date for the outcomes of the Lifecycle GHG Assessment. Paragraphs 7.5.4, 7.5.5 and 7.5.6 list the assumptions and limitations to the quantification of the lifecycle GHG assessment. Similarly, paragraphs 7.8.8 to 7.8.20 list various assumptions that have been applied in the assessment. These are at a high level and do not allow for a full understanding of the assumptions and origins of the data. Can the applicant: • For each bullet point and/ or assumption, provide full justification for the assumptions made in respect to this site as opposed to a generic location. This should include justification of 'standard' distances for transportation in the context of the rural location. • Provide the underlying dataset associated with the full assessment, including figures for embedded carbon in the solar panels, and explain why these are 'precautionary assumptions' as stated in paragraph 7.5.2. • Provide any sensitivity analysis undertaken on the assumptions input to the assessment.
		Current Baseline Carbon Sinks As stated in Paragraph 7.4.10 of **ES Chapter 7: Climate Change** [APP-058] "*While current land use within the Order Limits will have minor levels of associated GHG emissions, it is anticipated that these emissions will not be material in the context of the overall Scheme. Therefore, for the purposes of the lifecycle GHG impact assessment, a GHG emissions baseline of zero is applied. This represents a worst-*

ExQ1	Question to:	Question:
		case assessment for the purposes of the GHG calculations". The land use emissions associated with the Scheme are expected to decrease over its lifetime due to the low carbon sink potential of agricultural land (where emissions are released through tillage). The GHG benefits of the low-carbon energy produced by the Scheme are considered to be substantially greater than the carbon sink potential of the existing land. While lichens are vital indicators of good air quality, their carbon sequestration potential on any trees within the Order Limits is likely to be extremely low, and vastly lower than the very tangible carbon benefit of the Scheme in providing low-carbon generation capacity that will displace higher carbon alternatives. As such, any adverse effects on lichens would not be in any way material to the carbon benefits that the Scheme would provide. **Qualitative Elements of Carbon Assessment** The Applicant considers that all material emissions associated with the Scheme have been assessed quantitatively, with relevant assumptions stated in Paragraphs 7.5.4 to 7.5.6 of **ES Chapter 7: Climate Change** [APP-058]. Qualitative impacts are discussed in the Overall GHG Impact section (Paragraphs 7.8.32 to 7.8.35) where potential benefits are discussed more broadly. **Construction Start Date** The start date of construction is not considered to have a material impact on the magnitude of emissions resulting from construction. A later commencement of construction may lead to some construction emissions falling into the 6th Carbon Budget, however these emissions are not considered to be significant. A full description of the expected effects of a later start date can be found in **Sensitivity Analysis - Connection to the National Electricity Transmission Network** [AS-029]. **Assumptions**

ExQ1	Question to:	Question:
		The list of assumptions within the chapter have been provided in the absence of detailed design information. Precautionary assumptions have been described as 'worst-case' within the list of assumptions. This includes assuming BESS and PV panels will be manufactured in East Asia and assuming peak construction workforce across the construction period for worker transport emissions calculations. These assumptions and standard RICS values may overestimate emissions compared to actual practices during construction and are considered precautionary. With regard to the underlying dataset, the carbon intensity of the solar PV infrastructure is based on an average of the following Environmental Product Declarations (EPDs), which were current at the time of assessment: • Jinko Solar Holding Co., Ltd (2021)[6]; • Norwegian EPD Foundation[7]. **Transport Distances** Transport distances within the UK have been assumed using RICS 2nd Edition WLC guidance[8] and are considered to be applicable to all construction projects within the UK. Additionally, any additional emissions relating to road transport within the UK will be minimal when compared to the distance from the point of origin, which is assumed as East Asia for the purposes of the assessment.

[6] Jinko Solar Holding Co., Ltd (2021) Environmental Product Declaration. Available at: https://www.epditaly.it/en/wp-content/uploads/2016/12/Jinko-EPD-final-report-20210618-1.pdf [Accessed 22/10/2026]
[7] Norwegian EPD Foundation (2021) Environmental Product Declaration. Available at: https://www.epd-global.com/getfile.php/13204988-1741716236/EPDer/Byggevarer/NEPD-3087-1726_MAXEON-3-MONO-CRYSTALLINE-PHOTOVOLTAIC-MODULE.pdf [Accessed 22/10/2026]
[8] Royal Institute of Chartered Surveyors (2023) Whole life carbon assessment for the built environment 2nd edition. Available at: https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/construction-standards/whole-life-carbon-assessment [Accessed 22/10/2026]

ExQ1	Question to:	Question:
		Sensitivity Analysis The GHG assessment has considered a worst-case emissions scenario in-lieu in line with the Rochdale Envelope principle, PAS2080:2023 and ISEP guidance. As noted within **ES Chapter 7: Climate Change** [APP-058], the majority of the emissions are associated with embodied carbon within materials (mostly PV panels and BESS components) and the transportation of materials. The assessment has used precautionary estimates for these parameters, as explained above. Due to the precautionary assessment approach adopted, it is considered that at detailed design stage, the GHG emissions associated with the Scheme would be no worse than those set out within **ES Chapter 7: Climate Change** [APP-058]. As such, a further sensitivity analysis of the assumptions is not considered to change the conclusions of the assessment, as precautionary assumptions have already been used within the calculations.
Q10.0.3	The applicant	**Embedded mitigation** Mitigation measures for GHG emissions during construction, operation and decommissioning are described in table 3-3 of the OCEMP [REP1-061], OOEMP [REP1-063] and Outline Decommissioning Management Plan (ODEMP) [REP1-065] respectively. • The mitigation measures do not appear to include the requirement to source photovoltaic (PV) panels and BESS components with the lowest embedded carbon or products/ materials with the lowest transportation emissions during construction and operation. As these are the largest sources of carbon associated with the scheme according to section 7.8, should consideration be given to this? If not, why not? • Several of the mitigation measures include the phrase 'where reasonably practicable'. How is it proposed that these proposals are enforced based on this wording?
		The Applicant has not committed to procuring photovoltaic (PV) panels and BESS components with the lowest embedded carbon or products/ materials with the lowest transportation emissions during

ExQ1	Question to:	Question:
		construction and operation. Such a commitment would unnecessarily constrain procurement and supply chain flexibility and could prevent the selection of products that are otherwise suitable for the Scheme. Also, it is possible that a panel with higher embedded carbon might have a higher rated capacity and therefore produce more renewable energy, which may offset the former. The assessment has been undertaken on the basis of the current best available information, though there is a high degree of confidence that solar PV module supply chain will continue to decarbonise into the future. The greenhouse gas assessment has therefore been undertaken on a reasonable worse-case basis in order to conclude that the Scheme would have a Significant, Beneficial effect on residual Greenhouse Gas Emissions (GHG). Therefore, the Applicant does not consider it necessary or appropriate to secure such a procurement requirement through the outline management plans. The outline management plans are intended to provide a framework for the implementation of management and mitigation measures, reflecting the fact that detailed design and construction methodologies would be confirmed post-DCO consent. This flexibility enables mitigation measures to be appropriately applied following the completion of pre-construction surveys, detailed design and the confirmation of detailed construction methodologies. The Applicant does not consider that the use of the phrase "where reasonably practicable" renders the mitigation measures unenforceable. As a general principle, where the environmental assessment relies upon a specific embedded mitigation measure or firm commitment, the outline management plans seek to secure that measure without qualification.. For example, Table 3-7 of the **OCEMP** (Doc Ref. 7.10 Rev 3) includes a firm commitment for the Scheme to provide shuttle bus services to transfer staff to and from the Site, with no qualifying phrases used (see page 8 of the **OCEMP** (Doc Ref. 7.10 Rev 3)). The outline management plans establish the framework of environmental controls that must be incorporated into the detailed management plans submitted for approval under the relevant

ExQ1	Question to:	Question:
		requirements. Compliance with the approved management plans is secured through the **Draft DCO** (Doc Ref. 3.1 Rev 3). Where a measure is qualified by the phrase "where reasonably practicable", the undertaker would be required to demonstrate, as part of the approval process and implementation of the relevant management plan, that proper consideration has been given to the measure and that it has been implemented where reasonably practicable in the circumstances. The Applicant therefore considers that the use of such wording appropriately balances environmental objectives with the need to retain flexibility for the implementation of general good practice measures, the tailoring of mitigation to the context of the Site and design requirements of the Scheme, and to respond to detailed design, site-specific conditions and construction methodologies. The approach adopted in the outline management plans is consistent with other consented DCO projects (such as the Tillbridge Solar Farm Order 2025 and the Yorkshire Green Energy Enablement Project) Development Consent Order 2024 (National Grid)), where outline documents set the framework for environmental management measures, while the detailed management plans are subject to approval by the relevant planning authority prior to the commencement of the relevant works.

2.11. Habitats Regulations Assessment

2.11.1. The below table sets out the Applicant's response to the ExA's written questions relating to Habitats Regulations Assessment.

Table 2.11-1: Habitats Regulations Assessment

ExQ1	Question to:	Question:
Q11.0.1	The applicant Natural England	**Qualifying features – Nene Washes Special Protection Area – assessment of qualifying features in different seasons** The Habitats Regulations Assessment (HRA) Report [REP1-042] lists qualifying breeding birds for the Nene Washes (shoveler, garganey, gadwall, black-tailed godwit, pintail, teal, wigeon). However, for some of these the publicly available Special Protection Area (SPA) citation includes these as wintering species which does not appear to be referred to in the HRA. Can the applicant and NE provide clarity on the seasonal status of these qualifying features and the need to specifically assess this in the HRA Report.
		These species have been taken into consideration in the assessment. Table 2 in the **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2) has been amended at Deadline 3 to present these clearly with reference to their seasonal status.
Q11.0.2	Lincolnshire Wildlife Trust Natural England	**Qualifying features – whooper swan** The ExA notes that both parties have raised concerns in relation to whooper swan ([RR-112] [RR-140] (NE10), in addition to concerns being raised by other IPs. Whooper swan is not listed within the HRA Report [REP1-042] as a qualifying feature of any of the European sites assessed. However, in the response to NE3 [REP2-025] [REP2-026], NE states that they qualify under the definition provided in the Supplementary Advice to the Conservation Objectives for the Wash SPA. • The ExA requests clarity as to whether there is a specific requirement to assess whooper swan as part of the assemblage features of these sites.

ExQ1	Question to:	Question:
		• Noting the amendments to ES Appendices 9-4 to 9-6 [APP-102] to [APP-104], please confirm if there are any specific concerns relating to whooper swan (or any other potentially omitted European sites or qualifying features) and the conclusions of likely significant effects (LSE) and/ or adverse effect on integrity (AEoI) within the HRA Report [REP1-042]?
Q11.0.3	The applicant Natural England	**Qualifying features – The Wash Special Protection Area and Ramsar site and Nene Washes Ramsar site – presence of golden plover** Paragraphs 4.4.33 and 4.4.34 of the HRA Report [REP1-042] provides justification for the conclusion of LSE to the Wash SPA and Ramsar site, and Nene Washes Ramsar site (with no LSE to the Nene Washes SPA). This is predominately in relation to the presence of golden plover. The ExA requests that the applicant provides clarity on the following: • For the Wash SPA, paragraph 4.4.33 states that golden plover is part of the waterbird assemblage for which both the SPA and Ramsar site are classified. However, table 2 states that the waterbird assemblage is made up of the individual species given under article 4.1, with no specific reference to other birds in the assemblage or to golden plover. Can the applicant confirm what individual species are present in the assemblage and how these have been assessed, in particular where they are not listed as individual qualifying features? • For the Wash Ramsar site, is golden plover considered to be part of the criterion 5 assemblage, and if so, can the applicant confirm what individual species are present in the assemblage and how these have been assessed? • For the Nene Washes Ramsar site, paragraph 4.4.34 states that there is a population of golden plover associated with the Ramsar site, however this does not appear to be listed as a criterion in tables 4 or 6. Can the applicant confirm the status of this criterion (as it is noted that the publicly available Ramsar information sheet includes a criterion 2 "The site supports an important assemblage of nationally rare breeding birds. In addition, a wide range of

ExQ1	Question to:	Question:
		raptors occur through the year? The site also supports several nationally scarce plants, and two vulnerable and two rare British Red Data Book invertebrate species have been recorded". Please clarify why these do not appear to be referred to in the HRA Report. • NE are also invited to provide comments on the above matters, in particular on the position set out in their RR [RR-140] (NE10) that "The golden plover population that over-winters on The Wash is of international importance and as such is considered to be a main component species within the waterbird assemblage". The Response to NE3 [REP2-025] [REP2-026] referring to golden plover, lapwing and whooper swan is noted but the ExA requests clarity as to whether there are any further species which require specific consideration as part of the assemblage features of these sites.
		All waterbirds that potentially form part of the overall assemblage associated with the relevant sites (including golden plover) are taken into account in the assessment for the waterbird assemblage as a qualifying feature, not limited to those specifically listed on citations. **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2) has been updated to clarify this point. Nene Washes Ramsar is designated for those species qualifying under Criteria 2 (nationally rare breeding birds, also noting raptors, scarce plants and scarce and rare invertebrates) and 6 (wintering Bewick's swan and breeding black-tailed godwit and pintail, but species listed as occurring in nationally important wintering populations are reported only as noteworthy fauna, not qualifying species. **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2)has been updated at Deadline 3 to clarify the inclusion of features qualifying under Criterion 2.
Q11.0.4	The applicant Natural England	**Qualifying features – consideration of possible future Ramsar criterion** For the Wash Ramsar site and Nene Washes Ramsar site, table 2 of the HRA Report [REP1-042] lists "Species/ populations identified subsequent to designation for possible future consideration". However, no conclusion is provided on these in table 6.

ExQ1	Question to:	Question:
		Can the applicant and NE confirm the status of these species and the requirement to be assessed in the HRA Report?
		These species have been taken into account in the assessment within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2) and are treated as qualifying species. **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2) Table 6 has been updated at Deadline 3 to provide further clarification.
Q11.0.5	The applicant	**Likely significant effects – figure of areas assessed for the potential to be functionally linked land** The ExA notes the HRA Report was updated at DL1 [REP1-042] to include an assessment of several land parcels that have the potential to be functionally linked land (FLL) but have been assessed by the applicant as not comprising FLL. Provide a figure showing these land parcels and indicate which are inside the OL, and which are outside. This has also been requested by NE at DL2 [REP2-025] [REP2-026].
		This figure has been provided in the updated **ES Appendix 9-14 HRA Report** (Doc Ref. 6.3 Rev 2) at Deadline 3.
Q11.0.6	Natural England	**Likely significant effects – additional assessment of functionally linked land** The applicant has updated the main text in relation to FLL and provided a new appendix 3 within the HRA Report [REP1-042]. Does the information provided resolve your concerns over the potential for further areas of FLL [RR-140] (NE5)), and subsequent assessment omission (NE6, NE8)? If not, what further information is required? Do NE have any specific concerns or evidence that there are further areas of FLL within the study area?
Q11.0.7	The applicant	**Likely significant effects conclusions – Nene Washes Special Area of Conservation** Table 4 of the HRA Report [REP1-042] lists water pollution as a potential impact pathway for the Nene Washes Special Area of Conservation (SAC). However, no further information is presented on

ExQ1	Question to:	Question:
		this and a conclusion is not presented in table 6, as it only provides a conclusion on air quality (which is not included in table 4) for the Nene Washes SAC. Can the applicant confirm whether this pathway has been considered for the Nene Washes SAC and, if so, provide this information?
		The Scheme is located north of Nene Washes within the wider Nene Lower Operation Catchment area, which drains northward toward the Wash. As such, there is no meaningful pathway for water quality impact on Nene Washes SPA. **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2) Table 6 has been updated at Deadline 3 to provide further clarification.
Q11.0.8	The applicant	**Likely significant effects conclusions – air quality** The ExA notes that NE will not make bespoke comments on air quality impacts [RR-140] (NE12) and that the 'Standard Advice for Air Quality Impacts in Nationally Significant Infrastructure Projects' "produced by Natural England should be referred to. Please detail how you have considered the standing advice, setting out the implications for the proposed development and examination of this application.
		ES Appendix 9-14: HRA Report (Doc Ref. 6.3 Rev 2), in paragraphs 4.4.38 to 4.4.45, considers air quality effects, taking account of Natural England guidance as well as guidance from JNCC[9] and Institute of Air Quality Management (IAQM)[10], with specific reference to Natural England guidance[11] at para 4.4.41. NE's Standard Advice referred to in this question was not available at the time of

[9] Chapman, C and Kite, B. (2021). Main Report. Guidance on Decision-making Thresholds for Air Pollution. JNCC Report No. 696. Available online at: https://data.jncc.gov.uk/data/6cce4f2e-e481-4ec2-b369-2b4026c88447/JNCC-Report-696-Main-FINAL-WEB.pdf

[10] Holman, C., Barrowcliffe, R., Harker, G., Hawkings, C., Horrocks, S., and Prismall, F. (2020). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.1, Institute of Air Quality Management, London

[11] Natural England (2018). Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. June 2018

ExQ1	Question to:	Question:
		preparing the HRA (having only been received as part of Natural England's Relevant Representation). However, it largely mirrors the relevant guidance referred to, with specific reference to IAQM guidance and other Natural England advice taken into consideration[12]. The HRA has since been reviewed against the Standard Advice, and Applicant is comfortable that it addresses the requirements of that advice, following the process of assessment set out in the guidance documents. The assessment concludes that contributions to pollutant loads/ levels from the Scheme at the relevant sites is negligible, so no likely significant effects are predicted. The Applicant does not therefore consider the Standard Advice to have any further implications for the Scheme or examination of the DCO Application.
Q11.0.9	The applicant Natural England (and all interested parties)	**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.
		Since the issue of the **Response to Section 51 Advice** [AS-028], the Applicant has amended Requirement 12 in the **Draft DCO** (Doc Ref. 3.1 Rev 3) at Deadline 1 in response to comments received from the Environment Agency, so that specified permitted preliminary works cannot commence until a CEMP has been approved. Certain low-risk permitted preliminary works remain excluded from the Requirement where a CEMP is not considered necessary. The Applicant

[12] Natural England (2025) Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site. https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities

ExQ1	Question to:	Question:
		considers that the amended drafting appropriately secures the environmental mitigation measures contained within the CEMP. There are no impacts to the conclusions of **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2).
Q11.0.10	The applicant Natural England (and all interested parties)	**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
		The Applicant confirms that Table 1-1 of the **Sensitivity Analysis – Connection to the National Electricity Transmission Network** [AS-029] includes commentary on the Likely Significant Effects (LSE) for Ecology and Biodiversity based on the latest Scheme commencement date permitted by the **draft DCO** (Doc Ref. 3.1 Rev 3). The existing land uses within the Order Limits are assumed to remain unchanged, with the exception of the delivery of the NGET Grimsby to Walpole (including the Weston Marsh B substation) and WMEL projects, which are assumed to be constructed and operational by 2034. If ground disturbance in the same location as for Grimsby to Walpole and WMEL projects was required, i.e. where there are overlapping Order Limits with these schemes, it is expected that the cumulative schemes may have already removed or disturbed existing habitats, protected and notable species, where present. However, for a worst-case assessment, a baseline of no disturbance as a result of cumulative schemes has been assumed , so that all potential effects from the Scheme are considered. With no material change to the future baseline conditions, Scheme design,

ExQ1	Question to:	Question:
		construction methodology or operational activities of the Scheme, there is no change to the impacts and effects reported nor mitigation and monitoring requirements. On this basis, the Applicant does not consider that the variable grid connection date or the findings of the sensitivity analysis give rise to any implications for the conclusions of the **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2). The conclusions of the HRA therefore remain unchanged.
Q11.0.11	The applicant Natural England (and all interested parties)	**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.
		The assessment considerations reported within Table 1-1 of **Work No. 14 Assessment Summary** [AS-030] for **ES Chapter 9: Ecology and Biodiversity** [REP1-018] are also relevant to **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2). There are no implications on the conclusions of the HRA Report as a result of the optionality of Works No.14.
Q11.0.12	The applicant Natural England	**AEoI conclusions – permissions for the installation of aerial markers/ bird diverters and security of this mitigation measure** Aerial markers/ bird diverters would be secured in the OOEMP [REP1-063] with reference to the HRA Report [REP1-042], with the details to be determined at a later stage 'in consultation with Natural England'. • NE: Are you satisfied that this approach is sufficiently precise and enforceable? Given your statement that ongoing monitoring is a matter of best practice [REP2-025], what additional

ExQ1	Question to:	Question:
		requirement do you propose in included in the OOEMP to secure the required monitoring and adaptive measures? • Applicant: Confirm if you are content to include consultation with NE on discharge of Requirement 13. If so, provide your proposed wording. • Applicant: Comment on NE's proposals for best practice monitoring and adaptive measures. If possible, provide your proposed wording to secure these requirements.
		<u>Requirement 13</u> The Applicant does not consider it necessary for the wording of Requirement 13 to be amended to refer to consultation with Natural England, because the **OOEMP** (Doc Ref. 7.11 Rev 2) already confirms, at Table 3-5, that the specific model and specifications of the diverters will be determined at detailed design in consultation with Natural England. The OEMP, which must be prepared substantially in accordance with the OOEMP, will therefore also secure consultation with Natural England, and the approved OEMP must be implemented as approved. <u>Comments on Natural England's proposals</u> Natural England's comments at Deadline 2 [REP2-025] acknowledge "that it is likely not proportionate to undertake extensive VP survey work; instead focus should be on identification of collision victims on the ground". The **OOEMP** (Doc Ref. 7.11 Rev 2) has been updated for Deadline 3 to include reference to a reporting mechanism to facilitate the recording of collision incidents. This states: *"Bird collision incidents identified during monitoring, routine overhead-line inspections or reported by landowners, members of the public or other observers should be passed to the designated Environmental Manager throughout the operation of the Project. Collision incidents will be recorded in an incident log, including the date, location or overhead-line span, species, condition of the bird and photographic evidence. The*

ExQ1	Question to:	Question:
		recording of collision incidents can inform operational adaptive management. The designated Environmental Manager will coordinate a review of reported incidents (if any) on a regular basis, to include determination of whether adaptive management is required and the scope of any changes or additional monitoring. Documentation of this process will be shared with Natural England and, where relevant, other authorities." This outlines the process and confirms the commitment to ongoing incident logging for the lifespan of the Scheme.
Q11.0.13	The applicant	**AEoI conclusions – possible future amendments to diverters based on monitoring** The ExA notes the applicant's response to NE15 [REP1-074] [REP1-084] which states "Table 3-5 of the OOEMP [REP1-063] sets out that the diverters will be checked along with other overhead line checks, and replaced, as required. Year-1 post-installation monitoring and incident logging (diurnal/ nocturnal vantage point checks, where appropriate) will be undertaken". • Can the applicant provide an overview of the process that would be used to inform changes to the line marker design or location as a result of the year 1 monitoring, and the proposed consenting route for these changes should they be required. • Can the applicant state how the conclusions of the HRA Report [REP1-042] are currently compliant with the Conservation of Species and Habitats Regulations 2017 if there is no ongoing monitoring proposed beyond year one, as there does not appear to be a way to amend the proposed development beyond year 1 should collisions occur at a rate (alone or in combination) that may result in AEoI?
		The commitment to monitoring and incident logging, and any necessary adaptive management (such as additional line-markers and any additional monitoring requirements) as a result, are secured

ExQ1	Question to:	Question:
		through the **OOEMP** (Doc Ref. 7.11 Rev 2), relevant detail of which is noted in the Applicant's response to Q11.0.12. **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2) concludes no likely significant effect as a result of bird collision, taking account of the proposed mitigation and accounting for the uncertainties associated with variables in the assessment. Monitoring and corrective actions are not relied upon to reach this conclusion, nor would it be appropriate to do so in the HRA process; the assessment is sufficiently precautionary in its approach to uncertainties, that the conclusion of no likely significant effect is considered to be robust so as not to require additional validation. The OEMP will secure the process for ongoing recording and reporting of collision incidents, and implementation of remedial measures if required. This allows for management of risk of the predicted non-significant residual effects if collisions. In the unlikely event that collisions occur at rates that could be significant, remedial measures could include additional monitoring to determine the effectiveness of corrective actions. The assessment therefore complies with the Conservation of Species and Habitats Regulations 2017 in that identified likely significant effects have been subject to appropriate assessment which has concluded, taking account of the proposed mitigation, that the Scheme would not have an adverse effect on the integrity of the relevant sites or their qualifying features. Monitoring of collision incidents will provide additional surety that this conclusion remains valid.
Q11.0.14	The applicant	**AEoI conclusions – implications of the use of aerial markers/ bird diverters within the in-combination assessment** The ExA note that the in-combination assessment undertaken within the HRA Report [REP1-042] predominately relates to an increase in collision risk. Noting the requirement for aerial markers/ bird diverters, can the applicant provide a clear explanation of how the HRA Report has considered the

ExQ1	Question to:	Question:
		cumulative/ in combination effects of disruption of flight paths or avoidance of power lines by the relevant qualifying features, and subsequent impacts such as increased flight time?
		ES Appendix 9-14: HRA Report (Doc Ref. 6.3 Rev 2) has identified that the Grid Connection Route does not lie in the path of likely important commuting routes. As such there is not predicted to be any significant change in movement patterns of the qualifying features as a result of the Scheme. The installation of diverters will typically encourage birds to fly over or under the overhead lines, rather than to go around the marked sections. The lengths of marked sections (less than 2km) are such that if birds were to adjust routes to go around them, the overall change in flight times would not result in significant increases in flight times, even taking account of any additional adjustments to avoid other overhead line features for other features. As such this is not considered to result in any likely significant effect in combination with other projects.
Q11.0.15	Natural England	**Annex A – Summary of Natural England's position on HRA matters** The ExA draws NE's attention to the position summary in annex A of this document. Areas where NE disagrees with the applicant are highlighted in bold. The ExA seeks the following clarity on NE's position [REP2-025] [REP2-026], with specific reference to: • NE6 – Does NE consider that the potential for LSE from direct loss of FLL relates to the construction and decommissioning phases only, or the operational phase as well? • NE7 – Does NE consider that the potential for LSE from noise and visual disturbance to FLL relates to the construction and decommissioning phases only, or the operational phase as well? • NE8 – Does NE consider that the potential for LSE from predator shadows relates to the operational phase only, or the construction and decommissioning phases as well?

ExQ1	Question to:	Question:
		• NE18 – Do the concerns related to FLL (NE6, NE7 and NE8) also relate to the Nene Washes SPA as well as the Nene Washes Ramsar site, The Wash Spa and The Wash Ramsar site, or are NE in agreement with the applicant's conclusions of no LSE to all qualifying features of the Nene Washes SPA?

2.12. Historic Environment

2.12.1. The below table sets out the Applicant's response to the ExA's written questions relating to historic environment.

Table 2.12-1: Historic environment

ExQ1	Question to:	Question:
Q12.0.1	The applicant	**Micro-siting** NPS EN-3 paragraph 2.10.129 says the ability to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology. Can the applicant please signpost to where within the application documentation the approach to micro-siting during the construction phase is set out, including how micro-siting would be implemented to avoid or minimise the risk of damage to archaeological remains.
		In summary, the Applicant's approach to micro-siting is set out through the design flexibility and archaeological mitigation measures contained within the application documents. For example. the **Works Plans** [APP-009 and APP-010] and Schedule 1 of the **Draft DCO** (Doc Ref. 3.1 Rev 3) detail what works are allowed in each part of the Order Limits. The works described in the **Draft DCO** (Doc Ref. 3.1 Rev 3) can be microsited anywhere within the relevant Works Area, subject to the constraints in the management plans (e.g. the **OCEMP** (Doc Ref. 7.10 Rev 3) and the **OLEMP** (Doc Ref. 7.16 Rev 2)), and **Design Parameters** (Doc Ref. 7.4 Rev 2). For example, solar stations can be built anywhere in Work No 1 area and not precisely where illustrated on **ES Figure 2-2: Indicative Solar PV Area and Inter Array Area (**Doc ref. 6.2 Rev 2), but – as specified by the **Design Parameters** (Doc Ref. 7.4 Rev 3) - not within Flood Zone 3a or 3b (except for the Gotts catchment in Parcel D-1), nor within 250m of residential properties. This flexibility allows for micrositing of solar stations (in this example) to avoid localised archaeology, should post consent trenching identify buried archaeological deposits.

ExQ1	Question to:	Question:
		ES Chapter 8: Cultural Heritage (Doc Ref. 6.1 Rev 2) explains that the Scheme design has already incorporated embedded mitigation to avoid works within known archaeological constraints, where practicable, including avoidance buffers around designated heritage assets and refinement of the layout informed by desk-based assessment, geophysical survey and archaeological evaluation (paragraph 8.8.3). Furthermore, Table 5-7 of the **OLEMP** (Doc Ref. 7.16 Rev 2) summarises which habitat management areas have been defined with the purpose of protecting heritage assets. This includes compatible habitat management uses for the Scheduled Monument areas and field D4, which is a known WWII German Dornier 217 crash site. Due to the extent of archaeological deposits across the Solar Development Area, the avoidance of all archaeological deposits would not be achievable. As a result, a degree of flexibility for micro-siting infrastructure at detailed design stage has been included to support the avoidance of significant archaeological deposits where practicable (paragraph 8.10.6). A programme of additional archaeological evaluation, including pre-construction geophysical survey and trial trenching, seeks to identify archaeological deposits or features that may be impacted by construction of the Solar Development Area, Grid Connection Route and Inter-Array Connections. This approach has been agreed with the archaeological advisor at LCC and recorded within the **Statement of Common Ground with Lincolnshire County Council** (Doc Ref. 8.11 Rev 1) (see row 3.4.3). . The results of the programme of archaeological evaluation works undertaken to date and the pre-construction phase will be used to inform the detailed design which will include micro-siting to avoid significant archaeological deposits where practicable. This commitment is captured in paragraph 4.1.2 of the **OAMMS** (Doc Ref. 8.7 Rev 1) and table 3-4 of the **OCEMP** (Doc Ref. 7.10 Rev 3).
Q12.0.2	The applicant	**Embedded mitigation**

ExQ1	Question to:	Question:
		Section 8.8 ES Chapter 8 [REP1-016]. Please confirm if the embedded mitigation in section 8.8 is solely for the solar development area or is also for the GCR given there is no information provided regarding siting of the pylons or use of limits of horizontal deviation or choice of pylon type.
		The embedded mitigation detailed in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2) paragraph 8.8.2, includes information on how consideration of heritage assets including their character, heritage significance and importance, influenced the design of the Scheme including the layout of the Solar Development Area and the routing of the Grid Connection Route as the design of the Scheme evolved. A programme of additional archaeological evaluation, including pre-construction geophysical survey and trial trenching, seeks to identify archaeological deposits or features that may be impacted by construction of the Solar Development Area, Grid Connection Route and Inter-Array Connections. This approach has been agreed with the archaeological advisor at LCC and recorded within the **Statement of Common Ground with Lincolnshire County Council** (Doc Ref. 8.11 Rev 1) (see row 3.4.3). The result of the programme of archaeological evaluation works undertaken to date and the pre-construction phase will be used to inform the detailed design which will include micro-siting to avoid significant archaeological deposits where practicable, including the Grid Connection Route pylons. This commitment is captured in paragraph 4.1.2 of the **OAMMS** (Doc Ref. 8.7 Rev 1) and table 3-4 of the **OCEMP** (Doc Ref. 7.10 Rev 3).
Q12.0.3	The applicant	**Embedded mitigation** Paragraph 8.8.3 of ES Chapter 8 [REP1-016] refers to solar PV modules having been removed from north of Field C-2. Given there is no Field C-2, please confirm which field this is.
		Field C-2 should read C-2-01 in paragraph 8.8.3 of **ES Chapter 8: Cultural Heritage**(Doc Ref. 6.1 Rev 2) and has been updated for Deadline 3. The northern section of the field has been identified for Habitat Management, as described within **ES Chapter 3: Alternatives and Design** [APP-054].

ExQ1	Question to:	Question:
		Solar panels have also been excluded from fields B-2, C-2-03 and C-2-05, as shown on **ES Figure 2-2** (Doc Ref. 6.2 Rev 2) .
Q12.0.4	The applicant Lincolnshire County Council Historic England	**Embedded mitigation** To the applicant: A 20m buffer zone has been provided around two scheduled monuments within the OL. Please signpost to a figure where the buffer zone is shown. To LCC and Historic England (HE): Please confirm whether a 20m buffer zone is considered acceptable.
		The use of the 20m buffer zone has been detailed in table 3-4 of the **OCEMP** (Doc Ref. 7.10 Rev 3). This buffer is not expressly presented on a figure supporting the application. A new figure illustrating this buffer zone has been provided at Deadline 3 within **Appendix D** of this document.
Q12.0.5	The applicant	**Archaeology** Table 3-1 in the Planning Statement Appendix E: Heritage Harm Statement [APP-265] sets out the criteria for assessing magnitude of impact. The Heritage Harm Statement (HHS) identifies three areas where a major adverse magnitude of impact would result from direct loss: the northern section of Field B-5, archaeological deposits north of High Road, and an area within archaeological zone 1. Paragraphs 4.1.7, 4.19 and 4.1.11 of the same document state that, following an appropriate programme of archaeological mitigation prior to construction, the effect would be reduced from moderate adverse (significant) effect to residual minor adverse (non-significant). This is also reflected within ES Chapter 8 [REP1-016]. In light of recent decisions by the Secretary of State (Byers Gill Solar Farm EN010139, Fenwick Solar Farm EN010152) indicating that strip, map and record should be regarded as archaeological

ExQ1	Question to:	Question:
		recording and best practice, rather than mitigation for harm to archaeological remains, please explain whether and how this position affects the conclusions reached within the HHS.
		Recent Secretary of State decisions, including Byers Gill Solar Farm (EN010139) and Fenwick Solar Farm (EN010152), indicate that strip, map and record excavation should generally be regarded as archaeological recording and preservation by record, undertaken in accordance with professional best practice, rather than mitigation that removes or substantially reduces harm to archaeological remains. Consequently, assessment of harm should be based on the loss of the archaeological resource itself, with excavation recognised as a means of understanding and documenting that loss rather than avoiding it. The mechanism for understanding and documenting that loss is set out in the **OAMMS** (Doc Ref. 8.7 Rev 1). **Planning Statement Appendix E: Heritage Statement of Harm** {REP1-053] expressly states that, although archaeological excavation and recording may reduce the EIA significance of effects, they do not reduce the underlying heritage harm arising from the destruction of archaeological significance (paragraphs 4.1.7, 4.1.10 and 4.1.12). 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 the assessment, 'substantial harm' was defined as the total or near-total permanent loss of their cultural significance. The Applicant confirms its assessment that the impacts would not result in "total or near-total loss" of significance in relation to the archaeological deposits in the three locations identified. The recent decisions by the Secretary of State do not alter that conclusion.
Q12.0.6	Historic England	**Archaeology** ES Chapter 8 [REP1-016] table 8-2 refers to comments made by HE that the landscape is a complex of former wet and dry lands including high potential for waterlogged and salt industry remains and

ExQ1	Question to:	Question:
		that they welcome the use of intrusive fieldwork techniques targeting those aspects of site which present the greatest challenges in characterisation and risk management. The Final Archaeological Field Evaluation Report Parts 1 – 3 [REP1-075], [REP1-076] and [REP1-077] were submitted at DL1. The ExA note from the SoCG with HE [REP2-012] that HE is awaiting detailed reporting and targeted intrusive investigations. Please comment on the Final Archaeological Field Evaluation Report and whether it satisfies HE's comments with regard to the location of any intrusive fieldwork techniques.
Q12.0.7	The applicant	**Archaeology** The installation of solar panels may include the use of concrete pads to be installed to a depth below ground level up to approximately 0.5m and only where steel poles cannot be used due to ground conditions such as adjacent to existing utilities. Concrete footings are not to be installed in areas of Flood Zone 3a and 3b. Please confirm what approach would be taken if there are areas adjacent to existing utilities within Flood Zone 3a or 3b and what the implications on archaeological deposits would be.
		The Applicant has undertaken a review of the utilities record search across the Solar Development Area and can confirm that existing below ground utilities are located along existing roads and field boundaries. No existing below ground utilities have been identified from a desk-based search within areas to be panelled that are within Flood Zone 3a and 3b. If such areas were identified at detailed design stage, a suitable alternative design arrangement would be agreed with the relevant statutory undertaker through the protective provisions included within the **Draft DCO** (Doc Ref. 3.1 Rev 3).
Q12.0.8	The applicant	**Archaeology**

ExQ1	Question to:	Question:
		Areas of landscape planting are proposed throughout the OL. Following decommissioning this could be removed and could result in significant below ground impacts which would damage or destroy any surviving archaeology. Please signpost to where within the Outline Archaeological Mitigation Management Strategy (OAMMS) [REP1-078] appropriate mitigation measures are included to address this.
		Proportionate mitigation in regard to the potential impact on buried archaeological deposits as a result of landscape planting is detailed in the **OAMMS** (Doc Ref. 8.7 Rev 1) Section 4. The archaeological evaluation works undertaken and future phases of archaeological mitigation works undertaken during the construction phase will result in the cultural significance of the deposits being further understood. It is anticipated that there will be no further impact to the archaeological significance of these deposits as a result of vegetation removal. In addition, to reduce the risk of previously undisturbed archaeological deposits being impacted, all decommissioning activities are to be reviewed by an Archaeological Clerk of Works (ACoW) as defined in section 6 of the **OAMMS** (Doc Ref. 8.7 Rev 1) and the **Outline Decommissioning Environmental Management Plan (ODEMP)** (Doc Ref. 7.12 Rev 2). Should it be identified by the ACoW that the decommissioning activities, including removal of vegetation or planting may result in an impact on the cultural significance of previously undisturbed archaeological deposits, proportionate mitigation measures will be carried out. The **OAMMS** (Doc Ref. 8.7 Rev 1) has been developed in consultation with the Archaeological Advisor for LCC and Historic England and specific archaeological works during the decommissioning phase will be agreed with the Archaeological Advisor for LCC.
Q12.0.9	The applicant	**Archaeology** ES Chapter 8 [REP1-016] paragraph 8.10.7 outlines that protective measures, such as fencing, during all three phases would be installed to avoid unintentional damage to archaeological assets.

ExQ1	Question to:	Question:
		What approach would be taken to ensure that the fencing itself does not cause damage to archaeological heritage assets?
		During the early phase of the construction programme, temporary Heras fencing will be used to demarcate the 20m buffer zones around the Scheduled Monument until the permanent fencing is installed. The permanent fencing would remain in place through the remaining construction period, the operational phase and decommissioning. Heras fencing does not penetrate the ground. Individual post holes for the permanent perimeter fencing will not be archaeologically monitored as the fenceposts will be driven directly into the ground using standard post driver with no excavated foundations as detailed in **ES Chapter 2: The Scheme** (Doc Ref. 6.1 Rev 2) Table 2-1. Given the limited footprint of each post, archaeological investigation of these areas would require large-scale ground disturbance, which would have a far greater magnitude of impact than construction of the posts . The impact of metal palisade type fencing at specific locations such as the substation, compounds and CSECs will be mitigated as part of the archaeological works undertaken in relation to the impact of these larger Scheme elements. Other areas of archaeological deposits identified for protection for the duration of the construction, maintenance and decommissioning activities will be protected by temporary Heras fencing for the duration of the works activities if needed. The requirement of this demarcation will be determined by the ACoW as defined in section 6 of the **OAMMS** (Doc Ref. 8.7 Rev 1).
Q12.0.10	The applicant	**Archaeology** The Design Parameters [REP1-055] details the foundations of the 400kV substation, and the 132kV substation could have piles to a maximum depth of 12m. Please confirm how is this depth justified in an area of high or medium importance or archaeological deposits (for example, the 132kV

ExQ1	Question to:	Question:
		substation in parcel C is located in Archaeological Zone 1) and what alternatives to that location were explored to avoid such archaeological deposits.
		Archaeological evaluation works were undertaken in the location of the 400kV substation in field B-5 and the two 132kV substations in fields C-2-02 and D-3-06. The results of this work have demonstrated that archaeological deposits which hold cultural significance have been identified. Most of these deposits were found to be between 0.3m and 0.8m below ground level although some ditch features were recorded to 1.1m below ground level. Below this depth there is potential for deposits of paleoenvironmental or geoarchaeological importance to be present. The archaeological evaluation has also determined that these deposits extend outside the footprint of the substations. The impact assessment presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2) accurately presents the impact of the substations on these deposits as part of the wider archaeological landscape. It is committed in the **OAMMS** (Doc Ref. 8.7 Rev 1) that the substations locations will be subject to a full strip, map and sample to ensure the archaeological significance of the deposits is documented through archaeological recording, in accordance with professional best practice. Where piles extend to 12m in depth archaeological mitigation is not practical or proportionate for the full depth of the pile. Deposits of paleoenvironmental or geoarchaeological importance will be sampled and recorded in line with professional best practice as part of the mitigation phase. Archaeological potential was not the only factor considered during the design evolution process. The On-Site 132kV substation referred to in the question above was moved from Parcel B further east into Parcel C to place it outside the flood extents that could occur in the event of a breach of the River Welland flood defences in accordance with the sequential approach. The Flood Zone 1 area and proposed location of the substation within Parcel C is within an area of potentially high importance archaeological deposits, reflecting the slightly elevated roddon landforms present across

ExQ1	Question to:	Question:
		the Site. The need to avoid flood-risk constraints led to the selection of the Flood Zone 1 areas within Parcel C as the preferred location for the substation. This was considered acceptable from a heritage perspective as significant heritage effects can be mitigated through the implementation of the **OAMMS** (Doc Ref. 8.7 Rev 1). In the case of the 400kV substation within Parcel B-5 being sited on an area of medium archaeological potential, the reasoning and alternatives considered are discussed within paragraphs 3.6.26 to 3.6.39, and Table 3-6 of **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. This was considered acceptable from a heritage perspective as the deposits will be subject to archaeological recording, in accordance with professional best practice through the implementation of the **OAMMS** (Doc Ref. 8.7 Rev 1).
Q12.0.11	The applicant	**Archaeology – Zone 2** ES Chapter 8 [REP1-016] paragraph 8.9.7 states construction would result in a minor adverse direct impact on the archaeological zone as a whole, which is assessed as not significant. However, the paragraph then concludes that, when considered as a whole, the archaeological zone would result in a permanent moderate adverse effect, which is assessed as significant. Please clarify the distinction between these conclusions.
		Response assumes the ExA is referring to paragraph 8.9.17. The archaeological deposits across Archaeological Zone 2 have been determined to be of high importance due to the 'Settlement W of Cate's Cove Corner' (1004979) Scheduled Monument, known archaeological deposits of Iron Age or Romano-British settlement and salt production sites, as well as evidence of early medieval or medieval and post-medieval water management and agricultural practices. Due to the complexity of the archaeological deposits identified, their valuable

ExQ1	Question to:	Question:
		insight into the development of the fenlands and their association with the Scheduled Monuments, Archaeological Zone 2 is considered to be of high importance. The implementation of the design principles detailed in Table 3-4 of **ES Chapter 3: Alternatives and Design** [APP-054] and the **Design Approach Document** [APP-268], have resulted in the majority of the archaeological deposits within Archaeological Zone 2 being preserved *in situ*. However, Archaeological Zone 2 extends to cover fields C-1-06 and C-1-07 which have been identified for the installation of solar panels. Solar panels are also to be installed in the southwestern corner of field C-1-03 which is also within Archaeological Zone 2. Finally, the inter-array also passes through field C-1-08 and C-1-06 and landscape mitigation measures are identified along the boundary between the solar panels and Habitat Management Area 6. While the total area of the archaeological deposits within Archaeological Zone 2 being impacted is limited, based on the criteria set out in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2) Table 8-5 there will be change to some elements of the asset leading to a limited loss of integrity and cultural significance resulting in a minor adverse magnitude of impact. On an asset of high importance this results in a permanent moderate adverse effect, which would be significant. The presented assessment that the magnitude of impact on Archaeological Zone 2 as minor adverse is correct. The inclusion of "which would not be significant" in the same sentence does not accurately implement the assessment methodology and has been updated for Deadline 3.
Q12.0.12	The applicant	**Archaeology – zones of archaeological potential** ES Chapter 8 paragraph 8.9.19 describes that Zone 3 is identified in the south of field B5 where this is mainly identified as Medium Importance. This is shown on ES Figure 8-5b: Zones of Archaeological Potential [APP-097]. Please explain why the remainder of field B5, which is a mix of medium and high archaeological potential and where permanent losses to archaeological deposits

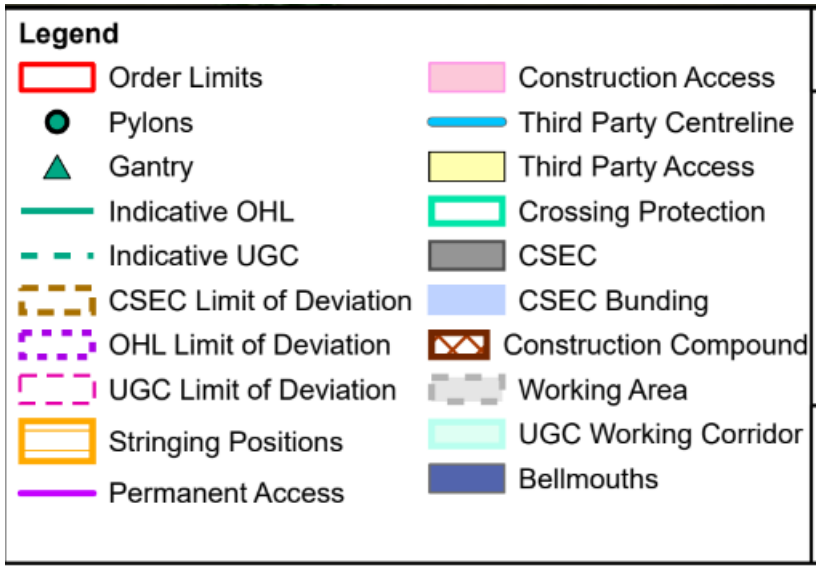
ExQ1	Question to:	Question:
		due to the construction of 400kV substation and BESS compound, is not identified as an archaeological zone. Furthermore, if it were included within the archaeological zone, how would this affect the assessment of effect for the remainder of field B5.
		Archaeological Zone 3 at the southern end of field B-5 was identified as medium importance due to professional judgement that the linear features detected on the aerial and geophysical surveys indicate the continuation of the line of the Scheduled earthwork boundary (1009980) considered to be the medieval boundary of the Crowland Abbey precinct. Based on the available information, a precautionary approach was undertaken so that the potential effect of the Scheme could be assessed in the event that the features were confirmed to be part of the medieval boundary of the Crowland Abbey precinct. Across much of the rest of Field B-5 the archaeological potential was assessed to be medium based on the archaeological desk-based assessment results and understanding of the wider archaeological landscape. This potential increases to high in areas of the roddons known to cross the field, reflecting the recognised association between roddon landforms and archaeological activity identified across the Solar Development Area. However, as set out in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2) paragraph 8.6.31, areas of archaeological potential and Archaeological Zones were defined using different criteria. An Archaeological Zone identifies an area where archaeological remains have been identified through the baseline studies and subsequently confirmed through intrusive archaeological evaluation. By contrast, areas of high and medium archaeological potential identify locations where archaeological remains are considered likely to occur based on the baseline evidence, non-intrusive survey results and wider archaeological context, but where a discrete concentration of archaeological remains of a particular archaeological character has not been demonstrated.

ExQ1	Question to:	Question:
		The remainder of Field B-5 was therefore not identified as an Archaeological Zone because the trial trench evaluation did not confirm the presence of a coherent concentration of archaeological remains comparable to that identified within Archaeological Zone 3. The evaluation demonstrated that Field B-5 was dominated by later agricultural and drainage features, mostly aligned with historic field boundaries visible on 19th-century mapping. Only limited evidence for earlier activity was present, mainly in the form of residual briquetage and bog iron ore, suggesting proximity to Iron Age/Roman salt-making and resource exploitation rather than direct settlement. No Roman settlement features comparable to those identified in Fields B-1-13, B-1-14 or C-2-02 were recorded, and no features considered to be associated with the medieval boundary of the Crowland Abbey precinct were identified. Consequently, while parts of the field retain medium to high archaeological potential due to their location on roddons and within a landscape known to contain archaeological remains, the evaluation results did not justify the definition of an additional Archaeological Zone. The construction of the 400kV Substation and BESS Compound, a construction compound, access tracks and below-ground cabling within Field B-5 would result in a direct, major adverse impact through the loss of archaeological deposits within the footprint of the proposed infrastructure. Outside Archaeological Zone 3, those archaeological deposits are assessed to be of medium importance and the effect is therefore assessed as permanent and moderate adverse, reflecting both the spatially limited extent of the impact and the survival of archaeological remains of comparable character and significance elsewhere within the wider landscape. Inclusion of the remainder of Field B-5 within an Archaeological Zone would not, in itself, alter the assessment of effect. The significance of effect is determined by the importance of the archaeological resource and the magnitude of impact, rather than by whether an area is classified as an Archaeological Zone. Therefore, even if the area were grouped within an Archaeological Zone for mapping purposes, the assessed impact and resulting significance of effect would remain

ExQ1	Question to:	Question:
		unchanged, as there is no evidence that the archaeological remains are of a higher importance or demonstrate the concentration, complexity or significance that would warrant a different assessment outcome.
Q12.0.13	The applicant	**Archaeology – construction phase** ES Chapter 8 [REP1-016] paragraph 8.9.20 makes no reference to the construction compound located in field D-5-02, as shown on ES Figure 2-6 [APP-078] sheet 6, which is in archaeological zone 5. There is no explanation in this paragraph of the impact that would have. Please explain why the construction compound is located in this field and why it is not located in an area of lower archaeological sensitivity? Please explain why field D5-02 is included in Zone 5?
		Parcel D includes one main site compound for the 132kV On-Site Substation and 11 secondary compounds within individual fields. The secondary compounds have been identified in Land Parcel D to minimise construction traffic movements on Langary Gate Road, reduce travel distances between work areas and minimise the need for additional temporary watercourse crossings between fields. The compound within Field D-5-02 is required to provide efficient access to the adjacent construction areas and infrastructure. Although the entirety of Field D-5-02 lies within Archaeological Zone 5, the compound is located outside the area of high archaeological potential shown on **ES Figure 8-5: Zones of Archaeological Potential** [APP-097]. Alternative locations within Field D-5-02 that would avoid Archaeological Zone 5 are not available because the whole field lies within the Archaeological Zone. Relocating the compound to another field would increase construction movements and require additional infrastructure, including further watercourse crossings, resulting in additional environmental and construction impacts The explicit mention of the construction compound in Archaeological Zone 5 in paragraph 8.9.20 was omitted in error and has been updated at Deadline 3. Despite this, the presence of the

ExQ1	Question to:	Question:
		compound was factored into the determination of the magnitude of impact. Therefore the effect reported is accurate. All other supporting information is also accurate. Desk-based assessment, aerial photographic mapping, geophysical survey and trial trench evaluation identified evidence for extensive Iron Age and Roman activity across Archaeological Zone 5. The archaeological remains comprise a wider landscape of enclosures, drainage systems, agricultural activity and settlement-related features associated with the fen-edge occupation of the area and the nearby Scheduled Monuments. While the archaeology recorded within Field D-5-02 is less intensive than that identified in neighbouring Field D-5-01, it forms part of the same archaeological landscape and contributes to understanding the extent, organisation and use of that wider landscape. The archaeological evidence therefore demonstrates sufficient continuity and association with the broader archaeological resource to justify inclusion of Field D-5-02 within Archaeological Zone 5. **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2) paragraph 8.9.20 should read as follows: Archaeological Zones 4-8 in Land Parcel D will be utilised for solar PV modules and the infrastructure to support them. A temporary construction compound will also be located adjacent to the southern boundary of Archaeological Zone 5, a small area of Archaeological Zone 6 and another adjacent to Archaeological Zone 7. As a result, there will be an impact on the high importance archaeological deposits in these areas. The solar PV modules, infrastructure to support them, along with temporary construction compounds, would have a minor adverse direct impact on the Archaeological Zones as a whole. On these areas of the Archaeological Zones of high importance this would result in a permanent moderate adverse effect, which would be significant.
Q12.0.14		**Archaeology – construction phase**

ExQ1	Question to:	Question:
	Lincolnshire County Council	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 that due to the temporary nature of the groundwater dewatering, there would be no additional impact on below ground archaeological remains?
Q12.0.15	The applicant	**Archaeology – Grid Connection Route** ES Chapter 8 [REP1-016] paragraphs 8.9.34 – 8.9.36. Can the applicant please explain: • What does 'the area west of' mean for pylons 4SV10, 4SV27 and 4SV35? Please define how far west. • What does 'the areas around 4SV10 etc' mean? • What does 'would be limited to the footprint of the GCR infrastructure' mean? Please confirm if a colour code for this has been used on ES Figure 2-7 [APP-079] to define this or demonstrate this extent for the purposes of archaeology.
		Where the assessment refers to 'the area west of' pylon 4SV10, 4SV27 and 4SV35 this is the land between or around the locations of these pylons and the Order Limits shown as shown on **ES Figure 2-7** (Doc Ref. 6.2 Rev 1). The individual pylons are also shown on this figure. The aerial photography survey has indicated a likelihood of Neolithic or Bronze Age curvilinear ditches and enclosures within the Order Limits and adjacent to 4SV10 and 4SV27. The survey also recorded a complex of features including ditches, enclosures and tracks in 4SV35 likely dating to the prehistoric period. Details of the proposed GCR infrastructure which may impact these features are depicted on **ES Figure 2-7** (Doc Ref. 6.2 Rev 1).

ExQ1	Question to:	Question:
		For the assessment the footprint of the Grid Connection infrastructure assumes the elements depicted on **ES Figure 2-7** (Doc Ref. 6.2 Rev 1) as show in the following image:  An outline drainage strategy has been developed for the GCR in accordance with best practice which sets out the drainage principles (**ES Appendix 11-4 Outline Drainage Strategy – Annex E** [REP1-052]). These principles have also been used to inform the assessment.
Q12.0.16	The applicant	**Archaeology – Grid Connection Route** Paragraph 8.9.38 of ES Chapter 8 [REP1-016] explains that should the design require undergrounding of the cable between High Road and the Weston Marsh B substation, based on a worst-case scenario the archaeological deposits would be of medium importance and the undergrounding would result in direct, major adverse impact on any surviving archaeological deposits resulting in a permanent moderate adverse effect, which would be significant. Based on

ExQ1	Question to:	Question:
		commentary made in paragraphs 8.9.33 - 8.9.36, please confirm what impact would occur to archaeological deposits as a consequence of constructing pylons 4SV36 – 4SV44 including the pylons, working areas, drainage and access tracks and why these pylons have not been included in section 8.9 of ES Chapter 8.
		As stated above, ES Chapter 8 presents the assessment of the buried cable option between High Road and the Weston Marsh B Substation Siting Area as the reasonable worst-case scenario. The underground cable option would require continuous ground disturbance along the route and therefore has the greatest potential to affect archaeological deposits. Consequently, the assessment of the overground option comprising pylons 4SV36-4SV44 was not reported separately within Section 8.9 of ES Chapter 8 (Doc Ref. 6.1 Rev 1), as this option would result in a lesser extent of ground disturbance because impacts would be restricted to the individual infrastructure footprints and associated working areas, and therefore a lower magnitude of impact. The assessment of the construction of pylons 4SV36 – 4SV44 including the pylons, working areas, drainage and access tracks as detailed on **ES Figure 2-7** (Doc Ref. 6.2 Rev 1) is as follows and has been added to the ES Chapter 8 (Doc Ref. 6.1 Rev 2) at Deadline 3: *"The fields between High Road and the Weston Marsh Substation Siting Area are recorded as containing features of Roman and unknown date. Evidence of Roman settlement and agricultural activity (MLI92281), a droveway and enclosure of potential Romano-British (MLI89823) date, and evidence of drainage (MLI86088) and a natural former watercourse (MLI86087) of unknown date. Based on a worst-case assessment it is considered that archaeological deposits within this area would be of medium importance. The installation of pylons, pylon working areas, drainage, temporary access tracks and a permanent access track would be required. Additionally, temporary construction compound G3 would impact on a field system of unknown date (MLI87291). As a result, there will be a direct, moderate adverse impact on the medium importance archaeological deposits which would be*

ExQ1	Question to:	Question:
		limited to the footprint of the works. Any associated archaeological deposits outside of this footprint would be preserved in situ. On these features, this would result in a permanent moderate adverse effect, which would be significant." Pre-construction phases of archaeological evaluation are to be undertaken as detailed in the **OAMMS** (Doc Ref. 8.7 Rev 1). This phase of evaluation will be used to confirm cultural significance of the archaeological deposits. The results of this evaluation will be used to determine appropriate mitigation measures which will be implemented in consultation with LCC.
Q12.0.17	Lincolnshire County Council	**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].
Q12.0.18	The applicant	**Archaeology – decommissioning phase**

ExQ1	Question to:	Question:
		Concrete foundations that may have been used as part of the development are proposed to be removed to a depth agreed with the relevant landowner. Please explain how this would be controlled and managed so to protect archaeological assets from further disturbance during this phase.
		In locations where a concrete foundation will be required, such as substations, BESS compound, solar stations and pylon bases, proportionate mitigation in regard to the impact on buried archaeological deposits has been detailed in the **OAMMS** (Doc Ref. 8.7 Rev 1) Section 4. The archaeological evaluation works undertaken to date and future phases of archaeological evaluation and mitigation completed during the pre-construction and construction phase, will result in the cultural significance of the deposits being understood. It is anticipated that there will be no further impact to the archaeological significance of these deposits as a result of the removal of these concrete foundations. In addition, to reduce the risk of previously undisturbed archaeological deposits being impacted, all decommissioning activities are to be reviewed by an Archaeological Clerk of Works (ACoW) as defined in section 6 of the **OAMMS** (Doc Ref. 8.7 Rev 1) and the **Outline Decommissioning Environmental Management Plan (ODEMP)** (Doc Ref. 7.12 Rev 2). The methodology for the removal of the concrete foundations will be undertaken following best practice and guidance. Should it be identified by the ACoW that the foundation decommissioning activities may result in an impact on the cultural significance of previously undisturbed archaeological deposits, proportionate mitigation measures will be implemented. The **OAMMS** (Doc Ref. 8.7 Rev 1) has been developed in consultation with the Archaeological Advisor for LCC and Historic England and specific archaeological works during the decommissioning phase will be agreed with the Archaeological Advisor for LCC.

ExQ1	Question to:	Question:
Q12.0.19	The applicant	**Additional mitigation and enhancement measures** Paragraph 8.10.1 of ES Chapter 8 [REP1-016] states that this section sets out the mitigation measures identified through the assessment process and proposed in addition to the embedded mitigation described in section 8.8. Please confirm whether the assessment presented in section 8.9 has been undertaken on the basis that both the embedded mitigation measures and the additional mitigation measures would be implemented. If so, please clarify whether any significant residual effects identified within the assessment are those remaining after the application of both embedded and additional mitigation measures.
		As detailed in paragraph 8.9.1 the assessment presented in section 8.9 considers the embedded mitigation described in section 8.8 of **ES Chapter 8: Cultural Heritage** [REP1-016]. The additional mitigation measures identified in section 8.10 are then considered as part of the residual effects assessment set out in section 8.11. Accordingly, the residual effects reported in section 8.11 assume the implementation of both the embedded and additional mitigation measures as detailed in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2). Any significant residual effects identified in section 8.11 are therefore the effects remaining following the application of both the embedded mitigation and the additional mitigation measures described in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2).
Q12.0.20	The applicant	**Heritage Setting Assessment** Appendix 8-4: Heritage Setting Assessment [APP-204]. The ExA note that whilst the explanation on page 1 of the document describes rows to be highlighted in red or blue, no colour coding is provided in the document for heritage assets with effects considered to be significant or not significant. It is all in white. Furthermore, there are a number of assets with effects considered to be significant in ES Chapter 8 [REP1-016] that are not coloured red in any of the tables within this appendix. Please

ExQ1	Question to:	Question:
		explain why this is the case. Additionally, whilst the text on page 1 discusses effects considered to be significant (or not), the table does not cover these categories and instead covers slight/ moderate. Why is this?
		The highlighted rows of the tables in **ES Appendix 8-4: Heritage Setting Assessment** [APP-204] were omitted in error as part of the formatting of the documents prior to submission. The Applicant identified this issue and an updated version of the appendix was submitted at Deadline 1 (**ES Appendix 8-4: Summary of Heritage Setting Assessment**[REP1-032]). As detailed in paragraph 8.9.14 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2) the assessment of changes within the setting of heritage assets which may potentially result in an impact on their heritage significance is presented in the appendix. The importance of the assets as well as the magnitude of impact is provided in the table in **ES Appendix 8-4** [REP1-032]. When the methodology in section 8.4 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2) is applied this results in a determination of the significance of effect which indicates if the row should be red (significant), blue (not significant) or white (no effect). Where potential for a significant effect was identified, further detail was provided in the chapter. As detailed in paragraph 8.4.29 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 2) the assessment considers that very large, large or moderate effects are significant in accordance with standard EIA practice and for the purposes of the EIA Regulations[13]. This criteria has been applied to the colour coding.
Q12.0.21	The applicant	**Historic Environmental Desk Based Assessment**

13 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: https://www.legislation.gov.uk/uksi/2017/572/data.pdf. [Accessed 06/03/2026]

ExQ1	Question to:	Question:
		Paragraph 4.8.3 of the Historic Environmental Desk Based Assessment (HEDBA) [APP-182] states that advice was sought from the Joint Casualty and Compassionate Centre at the Ministry of Defence and the Lincolnshire Aircraft Recovery Group. Was a response received from these bodies and if so, what response was given?
		The information provided by from the Joint Casualty and Compassionate Centre (JCCC) at the Ministry of Defence and the Lincolnshire Aircraft Recovery Group is included within paragraphs 8.8.4, 8.8.5 and 8.9.27 of **ES Chapter 8: Cultural Heritage** [REP1-016] and paragraphs 5.2.67 and 5.2.28 of the **HEDBA** [APP-182]. On the advice of the JCCC, no archaeological evaluation trenching was undertaken within a buffer of 150m around the crash site of the Lancaster Bomber in field A-1-11. JCCC advised that any archaeological excavation or construction activities undertaken within this buffer post-consent would require a licence under the 1986 Protection of Military Remains Act (POMRA86). The requirement for this licence is captured in the **OAMMS** (Doc Ref. 8.7 Rev 1) and in the **Schedule of Other Consents and Licences** [APP-030].
Q12.0.22	Lincolnshire County Council	**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.
Q12.0.23	The applicant	**Historic Environmental Desk Based Assessment**

ExQ1	Question to:	Question:
		Paragraph 4.9.5 of the HEDBA [APP-182] states that the interim results of the evaluation trenching have been used to inform this document, as the full evaluation report including post excavation analysis was not available at the point of writing. As the Final Archaeological Field Evaluation Report (Parts 1 – 3) [REP1-075], [REP1-076], [REP1-077] have been provided at DL1, please confirm what impact the final archaeological evaluation report has had on the findings within the HEDBA.
		The Applicant's review of the **Final Archaeological Field Evaluation Report** [REP1-075 to REP1-077] has concluded that the results provide a strong corroboration of the **HEDBA** [APP-182]. It does not undermine the HEDBA's central conclusions regarding the presence, distribution and significance of archaeological remains. Instead, it: • Confirms the HEDBA's identification of the roddon system as the focus of activity. • Confirms extensive Late Iron Age and Roman archaeology. • Confirms the reliability of the aerial and geophysical surveys. • Refines the interpretation of some supposed salterns into ring gullies/possible roundhouses. • In some locations expands the known extent of archaeological activity beyond that previously mapped but within the areas identified for mitigation during the post-determination and construction phases. Overall, the Applicant did not consider that an update to the **HEDBA** [APP-182] would be required, as the **Final Archaeological Field Evaluation Report** [REP1-075 to REP1-077] did not change the conclusions presented within the HEDBA with regards to the presence, distribution and significance of archaeological remains.

ExQ1	Question to:	Question:
Q12.0.24	The applicant Lincolnshire County Council	**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.
		The archaeological evaluation works for the inter-array connection between Parcels A and B will be undertaken during the post-consent, pre-construction phase, as part of a programme of additional archaeological evaluation including evaluation trenching designed to identify the extent and cultural significance of archaeological deposits or features that may be impacted by the Inter-Array Connection. This approach has been agreed with the archaeological advisor at LCC and is recorded in the **Statement of Common Ground with Lincolnshire County Council** [REP1-082]). The result of the programme of archaeological evaluation works undertaken to date, together with the additional post-consent, pre-construction geophysical survey and trial trenching, will be used to inform and agree a proportionate archaeological mitigation strategy for the underground cable prior to construction. This commitment is captured in paragraph 4.1.2 of the **OAMMS** (Doc Ref. 8.7 Rev 1) and table 3-4 of the **OCEMP** (Doc Ref. 7.10 Rev 3).
Q12.0.25	The applicant	**Historic Environmental Desk Based Assessment**

ExQ1	Question to:	Question:
		Paragraph 5.2.36 of the HEDBA [APP-182] refers to a potential ring ditch in area 20. Please explain where area 20 is within the Inter-Array Connections (IAC) area and please provide a figure of this.
		Area 20 is an eastern section of the IAC area between parcels A and B. The corridor was subdivided by the geophysical survey contractor to aid their reporting of results. The location of Area 20 can be seen on the sixth page of Figure 2 of Appendix D.2 of the **HEDBA** [APP-182].
Q12.0.26	Lincolnshire County Council	**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.

2.13. Human Health

2.13.1. The below table sets out the Applicant's response to the ExA's written questions relating to human health.

Table 2.13-1: Human health

ExQ1	Question to:	Question:
Q13.0.1	Lincolnshire County Council	**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.
Q13.0.2	Lincolnshire County Council	**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

ExQ1	Question to:	Question:
		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?

2.14. Land Use and Soils

2.14.1. The below table sets out the Applicant's response to the ExA's written questions relating to land use and soils.

Table 2.14-1: Land use and soils

ExQ1	Question to:	Question:
Q14.0.1	Lincolnshire County Council The applicant	**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.
		Cropping data within Appendix A of the **Applicant's Comments on Local Impact Report** [REP2-015] has been provided to present information on what crops have been grown across the Solar Development Area in recent years. The information demonstrates that the crops currently grown within the Solar Development Area provide limited food crops. This is evident from both the market data for Parcel D and the non-market data for other parcels. The cropping information is not directly linked to the determination of significant effects within the Environmental Statement and has been provided for context only in response to comments raised by Interested Parties, including LCC. The cropping data presented indicates that 95% of the land would not likely be subject to irrigation at any one year. A five-year average identifies that potatoes and sugar beet account for 5% of the Solar Development Area (with a lower proportion in recent years). It is these crops that would

ExQ1	Question to:	Question:
		receive irrigation, and even in drought, irrigation would not be extended to other crops grown in the Solar Development Area, such as cereals and maize. Potatoes and sugar beet have been historically grown within field parcels B-1-10, C-1-01, C-1-02, C-1-03, C-1-07 and C-1-08, albeit not every year. A figure has been included within **Appendix E** of this document to show these fields. Importantly, however, irrigation is not considered in assigning ALC grades. Soil moisture deficits must be calculated regardless of the availability of irrigation. Hence the assessment of effects on ALC grades and the soil resources have been considered appropriately within **ES Chapter 5: Agriculture and Soils** [REP1-014]. The absence of irrigation over the lifetime of the Scheme would not affect the ALC grading within the Site during the operational phase, or post decommissioning (irrespective of whether the land is then irrigated).
Q14.0.2	The applicant	**Agricultural Land Classification surveys – methodology** The applicant has provided ES appendices 5-2 [REP1-028] which detail the Agricultural Land Classification (ALC) surveys undertaken in parcels A and D, and appendix 5-3 [REP1-030] which provide detail of the ALC surveys undertaken in parcels B and C. The ExA request clarity from the applicant over the methodology used: • The figures provided within these appendices appear to show all locations that were proposed to be subject to an auger sample point. However, the accompanying site survey logs or annotations on the figures show that a number of these were not advanced including on further surveys undertaken since the initial submission of the application documents. The applicant is requested to update the figure to indicate which of the proposed locations were not possible to advance.

ExQ1	Question to:	Question:
		• The figures also do not appear to show where the soil pits were undertaken (indicated to be at least one per soil type). The applicant is requested to update the figures to provide these locations. • It is noted that parcels A and D utilise a spacing of approximately one auger per hectare. However, parcels B and C utilise one auger per ha in some areas, and one auger per 2ha in others. The ExA requests the rationale behind the 2ha survey spacing for parcels B and D. • It is not clear from the appendices why the applicant has chosen to group parcels A and D together (especially noting the differencing methodologies between appendices in terms of auger spacing), given that these are geographically separate and distant from each other. The ExA requests the applicant provide a justification for this approach.
		The Applicant provides the following clarification to the four bullet points: • Areas that were either not accessible or excluded from the survey are shown in Appendix I of **ES Appendix 5-2** [REP1-028] and Appendix I of **ES Appendix 5-3** [REP1-030]. The **OSMP** (Doc Ref. 7.14 Rev 2) includes a commitment to survey all unsurveyed land. The figures contained within the appendices identify areas that currently remain unsurveyed. These are identified within the legend as 'Inaccessible Areas' and 'Not Surveyed'. • The locations of soil pit logs are provided on the figures entitled "Meridian Pit Locations" at the end of Appendix III of **ES Appendix 5-2** [REP1-028] (PDF page 74) and at the end of Appendix III of **ES Appendix 5-3** [REP1-030] (PDF page 66). • Land which will remain in agricultural production (with no infrastructure) was surveyed at a less intensive survey density of one sample per two hectares. It was not considered that a

ExQ1	Question to:	Question:
		greater level of baseline data was needed to assess the impact on those areas of agricultural land remaining in agricultural use. The approach also followed prior agreement with Natural England. It is also noted that the majority of the area within Parcel B adjacent to Queens Bank has been excluded from the Order Limits since the completion of the ALC survey. The grouping of land parcels was driven by provision of land access; these land parcels were available for survey at the same time and therefore reported together. Grouping of parcels enabled a reduction in the total number of documents presented. It does not change the accuracy of the baseline characterisation or the assessment of effects.
Q14.0.3	The applicant	**Soil management plan – presence of peat** The response to the Fenland District Council RR [RR-049] is noted in relation to the absence of peat soils across the ALC surveys undertaken to date. However, the ExA notes that the proposed development may contain excavations/ piling or other works that advance deeper than those undertaken for the ALC surveys, and across a wider area. • On this basis, how can the applicant be confident at present that there are no peat soils across the whole order limits? • If the presence of peat cannot be ruled out, should the OSMP [REP1-068] be updated to include a protocol to be implemented in the event of encountering peat? • Please confirm how this correlates with comments made within the HEDBA [APP-182] paragraph 5.1.15 and the need for radiocarbon dating to be undertaken as part of the post excavation analysis of archaeological field evaluation trenching and how the undertaking of the radiocarbon dating would be secured.

ExQ1	Question to:	Question:
		The Applicant acknowledges that the archaeological investigations indicated the presence of peat between 2.00 and 3.00m Below Ground Level (BGL) within Parcel A and in smaller numbers of test pits in Parcel B which reduced the further west the test pits were located in the Solar Development Areas. The presence of peat, however, was not recorded as part of the ALC survey, as the augers for the ALC survey extend up to 1.2m BGL. The **HEDBA** [APP-182] further acknowledges that peat is rare on the surface due to being exploited for fuel during the medieval period, drainage causing large scale shrinkage of peat and wind erosion resulting in loss of surface peat. However, as evidenced from the archaeological investigations, peat may be present within the deeper geological layers. Across the Site, soils would not be excavated to the depth of the peat recorded on Site. The Applicant is, therefore, confident that the exclusion of peat soils from the **OSMP** (Doc Ref. 7.14 Rev 2) is adequate in relation to agricultural land and soil management. However, the Applicant acknowledges that piles may be driven through peat in deeper geological layers. If this were to occur, the piles would locally displace peat within the ground, rather than resulting in material quantities of peat being extracted from the ground. However, where peat is encountered through further archaeological investigations, post-excavation assessment of archaeological investigations, including radiocarbon dating, is secured through the **OAMMS** (Doc Ref. 8.7 Rev 1). Radiocarbon dating will not form part of the detailed SMP. It is further noted that the radiocarbon dating referenced within paragraph 5.1.15 of **HEDBA** [APP-182] has now been completed and is reported within **Final Archaeological Field Evaluation Report** [REP1-075].
Q14.0.4	The applicant	**Soil management plan – potential presence of physical and chemical contamination at reinstatement**

ExQ1	Question to:	Question:
		Is the potential for the presence of pollution (including physical objects), contamination or other changes to the physical or chemical properties of the soil a potential limiting factor in the ability to reinstate the soils to its baseline ALC grading? If so, should the OSMP [REP1-068] be updated to include measures to prevent these, or to remediate them prior to reinstate should these occur?
		The Applicant does not consider that physical or chemical contamination of soils is a significant risk factor given the lack of likely pathways arising in relation to the Scheme. Management and, if necessary, remediation of pollution is also secured through the **OCEMP** (Doc Ref. 7.10 Rev 3), the **OOEMP** (Doc Ref. 7.11 Rev 2) and the **ODEMP** (Doc Ref. 7.12 Rev 2). For instance, the **ODEMP** (Doc Ref. 7.12 Rev 2) identifies that appropriate remediation measures will be taken to protect decommissioning workers, future Site users, water resources, structures and services. However, the Applicant recognises that physical contamination of soil may include stones from access routes. The **OSMP** (Doc Ref. 7.14 Rev 2) specifies that once working areas and haul roads are no longer required, the land will be reinstated including removal of any stones These can be readily separated using an agricultural 'stone picker'. The same equipment could be employed for any other form of physical debris. The **OSMP** (Doc Ref. 7.14 Rev 2) describes achievable outcomes but avoids the specification of specific plant so that contractor selection is not limited. Existing stone pickers offer suitable technology for the task, but developments may have occurred by the time of restoration. Updating the **OSMP** (Doc Ref. 7.14 Rev 2) in this regard is therefore considered unnecessary.
Q14.0.5	The applicant	**Soil management plan – climate change** Is the potential for climate change impacts a limiting factor in the ability to reinstate the soils to its baseline ALC grading?

ExQ1	Question to:	Question:
		If so, should the OSMP [REP1-068] updated to include measures to address the potential for climate change to alter soil properties?
		The Applicant notes that climate change projections suggest milder, wetter winters and hotter, drier summers. However, unpredictability also increases. The Applicant notes that these changes do not provide a clear pathway to changes in soil properties, although more frequent wetting-drying cycles may increase soil nutrient cycling. Because stored soil bunds would be vegetated for long-term protection, the slope angles will be a maximum of 25° (to allow for maintenance), as set out within the **OSMP** (Doc Ref. 7.14 Rev 2). This reduced slope angle and the vegetation cover reduces the risk of soil erosion from bunds. The motivation for the reduced slope angle is safe working for maintenance, but it is also advantageous in the event of extreme rainfall. The Applicant notes that existing measures contained within the **OSMP** (Doc Ref. 7.14 Rev 2), such as maximum soil bund height and maximum slope angle, are considered capable of addressing potential climate change related impacts. Identifying measures to specifically address the impacts of climate change was therefore not considered necessary.
Q14.0.6	The applicant	**Soil management plan – decompaction strategy** Paragraph 4.1.3 of the OSMP [REP1-068] states that a decompaction strategy for construction, operation and decommissioning would be developed at the detailed design stage. However, the OSMP does not contain outline details of this strategy. The applicant is requested to update the OSMP to provide this information.

ExQ1	Question to:	Question:
		In response to Deadline 1 submissions the Applicant provided additional information on restoration within **Post ISH1 Note Best and Most Versatile (BMV) Land Take** [REP1-099]. This included discussion of the use of winged tine ploughs and the use of brassicas within a cover crop (non-harvested) planting mixture, which aids decompaction. Cover crops would be ploughed in to further improve soils. The Applicant has updated the **OSMP** (Doc Ref. 7.14 Rev 2) for Deadline 3 to reference these measures.
Q14.0.7	The applicant	**Soil management plan – decompaction strategy** The OSMP [REP1-068] states that the decompaction strategy would not seek to rectify any existing or unrelated soil compaction. • How will the applicant determine what compaction is existing or unrelated? • Given the large area of agricultural land potentially impacted, why does the applicant not propose to implement the decompaction of these areas, as would it not result in a potential beneficial effect compared to the baseline?
		The Applicant has committed, at decommissioning, to restoring land to its baseline ALC grade. This commitment is measurable and proportionate. The Applicant would implement measures to remove compaction from all soils at decommissioning, which would be measured through agricultural land classification. Commitments expressed in terms of remediation of compaction are less readily measured. The **OSMP** (Doc Ref. 7.14 Rev 2), in referencing existing soil compaction was intended to recognise the potential for existing plough pans (a dense, compacted layer, which can be created by repeated ploughing). This would require deep tine cultivation to remedy a pre-existing issue. However, the Applicant is committed to leaving the Site in the best condition upon decommissioning and the

ExQ1	Question to:	Question:
		statement has been removed from the **OSMP** (Doc Ref. 7.14 Rev 2) for Deadline 3, leaving open the prospect of land improvement..
Q14.0.8	The applicant	**Soil management plan – use of more than one soil management plan** Paragraph 2.7.5 of the OSMP [REP1-068] states that "Depending on the final construction programme, there may be more than one detailed soil management plan prepared for the Scheme during construction; for example, where different contractors are involved in different aspects of the Scheme". • Why is the applicant proposing more than one SMP, for example, why would one contractor be permitted or required to utilise a different management plan? • How could it be ensured that the management measures across more than one SMP would be consistent and compatible with each other? If it is the case that all would be based on the OSMP, the ExA refers to the above question as to the purpose of this approach. • How does the potential provision of more than one SMP relate to the requirement and relevant discharge within the dDCO [REP1-006]?
		The Applicant notes that the phased discharge of Requirements – that is, wording which provides that "no part" of the authorised development is to (for example) commence until a detailed management plan "for that part" has been submitted and approved – is very well-precedented, both in respect of Requirements securing soil management plans and more generally. It appears in numerous made DCOs (for example the Fenwick Solar Farm Order 2026 and the Cottam Solar Project Order 2024, including but not only in the Requirements securing soil management plans) and across various other Requirements within the **Draft DCO** (Doc Ref. 3.1 Rev 3). The justification

ExQ1	Question to:	Question:
		for this approach is also well-established, being to allow flexibility driven by matters such as phasing, contractor selection and across different components of a scheme. In respect of the Scheme specifically, the potential for multiple detailed SMPs has been referenced, as depending on the final procurement strategy, separate parts of the Site may be constructed by separate contractors (e.g. there will likely be a separate contractor for the Solar Development Area and the Grid Connection Route). Where multiple detailed management plans are required, the requirements for these would be discharged in relation to that specific part of the Site. All detailed SMPs would be produced in substantial accordance with the **OSMP** (Doc Ref. 7.14 Rev 2) in accordance with Requirement 19 of the **Draft DCO** (Doc Ref. 3.1 Rev 3). The detailed SMP(s) serve two purposes: compliance with the DCO requirements of the consented scheme and as a practical plan for the contractor to have and refer to on site. It is prudent that a practical operational plan should be tailored specifically to the responsibilities of the contractor for a given area within the Scheme. The emphasis on operation within a defined area of the Site, developed in conjunction with an appointed contractor, makes the potential for tailored documents a robust approach, as the relevant portions of the plan are readily available to a contractor. There would be commonality to all documentation, through compliance with the **OSMP** (Doc Ref. 7.14 Rev 2). The development of one plan or multiple plans would be in conjunction with a subject specialist or specialist organisation providing inputs to all documentation.
Q14.0.9	The applicant	**Soil management plan – requirement to establish a grass sward before construction** The OSMP [REP1-068] states that the applicant will establish and maintain a grass sward over the Solar Development Area (SDA) before trafficking over by construction plant and delivery vehicles.

ExQ1	Question to:	Question:
		• Why is this only considered a relevant mitigation measure for the SDA and not also the GCR or other works areas? • How long does the applicant consider that the establishment of the grass sward would take? • Does this have the potential to delay other construction works if the sward takes longer to establish or fails to grow in part or full?
		This matter provides a helpful example in respect of the Applicant's response to Q14.0.8 above regarding the need for approaches to be tailored to different elements of the Scheme. The sward to be established within the Solar Development Area is to provide permanent vegetation cover, which will remain across the operational period of the Scheme. The grass sward will establish within one growing season, although some species will continue to tiller and extend rooting in subsequent seasons. In areas of light construction traffic and under suitable weather conditions the sward itself is likely to provide adequate ground protection. However, this does not discount the use of protective matting for more frequently used routes or by heavy plant. Problems with sward establishment, on land of Subgrade 3b and higher grades, is not anticipated. If the sward were to fail in localised areas, then alternative ground protection would be employed. Supplementary seeding would be delivered post-construction. The land use for the Grid Connection Route and Inter-Array Connections will require temporary control for construction before being returned to the landowner for cultivation and cropping of choice. Establishment of a grass sward is therefore not required or appropriate, and temporary ground protection matting would be employed instead. Subject to landowner agreements and

ExQ1	Question to:	Question:
		depending on seasonality, the landowner could be supported in establishing a cover crop (sown to protect and enhance soil but not harvested) before productive cropping is resumed.
Q14.0.10	The applicant	**Soil management plan – material to separate bunds** The OSMP [REP1-068] states where continuous bunds are formed on dissimilar soils, a barrier material should be used to separate. Can the applicant confirm what this barrier material is likely to be? If it is of a material type of another soil or similar, how would the applicant prevent the mixing of this into the stockpiles?
		UK Environmental and Planning guidelines provided by Natural England[14] identify that single bunds should have different soils separated by a material, such as a synthetic barrier of woven geotextile. It is important to maintain this possibility within the **OSMP** (Doc Ref. 7.14 Rev 2). However, it is most relevant to highly constrained sites, where bunds cannot be separated. It is the preference of the Applicant to maintain separate bunds for dissimilar soils, and this would be described, in conjunction with an appointed contractor, in the detailed SMP.
Q14.0.11	The applicant	**Land holding details** For each of the agricultural land holdings in the SDA, GCR and IAC, please provide the following information in a tabular format. Please also provide similar information for tenant farmers: • name and address of holding

[14] Natural England (2022). Planning and aftercare advice for reclaiming land to agricultural use. Available at: https://www.gov.uk/government/publications/reclaim-minerals-extraction-and-landfill-sites-to-agriculture/planning-and-aftercare-advice-for-reclaiming-land-to-agricultural-use [Accessed 22/10/2026]

ExQ1	Question to:	Question:
		• relevant plot(s) number • total size of holding • holding use • breakdown of land classification – by hectare and percentage of holding • summary of proposed activity on holding • loss of land – defined by temporary and/ or permanent and hectare and percentage of holding
		The Applicant is in the process of collating this information and will provide it at Deadline 4.
Q14.0.12	The applicant	**Animal wellbeing** What consideration has been given to the effect on the health and wellbeing of any animal housed close to the proposed development from, for example, effects due to noise and dust. What, if any, measures are necessary to mitigate effects and how will these be secured?
		The Applicant acknowledges concerns regarding the potential effects of the Scheme on animals housed in close proximity to the Scheme. Whilst the Air Quality assessment set out in **ES Chapter 6: Air Quality** [APP-057] and the Noise and Vibration assessment presented in **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1 Rev 1) does not propose mitigation measures specifically for animals, the general construction phase mitigation measures set out within the **OCEMP** (Doc Ref 7.10 Rev 3), including measures to control dust generation and minimise noise impacts, will apply across the construction works and will reduce the potential for disturbance to nearby receptors, including animals. In addition, any disturbance associated with construction activities would be temporary and localised in nature, which as animals are generally mobile, they will be able to move away from the temporary sources of disturbance.

ExQ1	Question to:	Question:
		Accordingly, the Applicant considers that the dust and noise mitigation measures set out in the **OCEMP** (Doc Ref 7.10 Rev 3), which are secured by Requirement 12 of the **Draft DCO** (Doc Ref. 3.1 Rev 3), are appropriate and proportionate and that no additional mitigation measures specifically for animals are required.
Q14.0.13	The applicant	**Hedgerow planting** It is proposed to plant an additional 49.80km of native hedgerow and to enhance a further 36.53km of existing hedgerow, and that this would result in 19.1ha of the permanent removal of Best and Most Versatile (BMV) agricultural land. Where new hedgerow planting would result in the loss of BMV agricultural land from agricultural production, provide a clear justification for that loss and explain why the use of BMV land for this purpose is considered necessary.
		The Applicant notes that linear planting at field margins represents good practice, including in relation to land and agricultural production. It provides landscape and visual screening of the Scheme, provides biodiversity benefits and improves habitat connectivity. It has also been widely requested through stakeholder consultation. Furthermore, systems integrating boundary planting with agricultural cropping demonstrate that under extreme weather conditions (droughts or winds), boundary planting improves production on the adjacent crop. Landowners may also plant hedgerows independently of the planning process. Within **ES Chapter 5: Agriculture and Soils** [REP1-014], the application of a buffer to the boundary planting to calculate land take acknowledges a potential canopy and hedgerow spread and potentially exaggerates land take required. The planting of lines of nursery stock could have been presented as having width of less than 1m and the area and magnitude thresholds calculated accordingly. This approach would yield magnitudes one tenth of those presented. Throughout the operational phase, the stem size of the trees and hedges (the direct occupation of the land) would

ExQ1	Question to:	Question:
		remain less than 1m wide. An allowance has been made for canopy development and for dedicated access for hedgerow management, which represents the worst-case effect on BMV land. The approach has been openly expressed but an alternative approach, of measuring only the footprint of the planting, could have been applied, greatly reducing threshold categories. The Applicant also notes that whilst **ES Chapter 5: Agriculture and Soils** [REP1-014] has assessed landscape planting as a permanent effect on a precautionary basis, following decommissioning, once the land has been handed back to the landowners, they may choose to seek the necessary permissions to remove the planting, if they wish to do so.
Q14.0.14	Lincolnshire County Council	**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?
Q14.0.15	The applicant	**Restoration** The ExA notes that the loss of BMV agricultural land beneath areas of hardstanding during the operational phase of the proposed development is assumed to be permanent, on the basis that soils may take several years to recover [REP1-099]. Please clarify what is meant by 'several years' and provide an estimated timeframe for soil recovery.
		Additional information has been provided on restoration of land under hardstanding within **Post ISH1 Note Best and Most Versatile (BMV) Land Take** [REP1-099]. Such restoration of hardstanding primarily involves addressing two key issues: the compaction of subsoils beneath hardstanding and reduced biological activity within soils under anaerobic conditions beneath hardstanding. The restoration process to address these impacts will comprise cultivations to remove compaction and

ExQ1	Question to:	Question:
		the sowing of cover crops (non-harvested) to introduce biological activity to the subsoil. Further cultivation will incorporate the cover crop. The number of cover crop rotations required to restore soil back to original grades depends on the relative development of the subsoil. Subsoil is a more challenging crop growing medium than topsoil but will be cultivated and cropped to develop soil biological activity before reinstatement of topsoil. Hence, this is not a precise timeframe and is why reference has been made to "several years" and why it has not been possible to commit to restoration within the decommissioning period for the Scheme. It is on this basis, that it has been considered appropriate for the precautionary assessment approach to presume "permanent" effects in areas of longstanding hardstanding. "Several years" is likely to require one or two seasons of subsoil cultivation and cropping before topsoil reinstatement. The process may continue with a season of cover cropping of the reinstated topsoil, providing what is termed a green manure. However, agricultural cropping could resume at that point.

2.15. Landscape and Visual

2.15.1. The below table sets out the Applicant's response to the ExA's written questions relating to landscape and visual.

Table 2.15-1: Landscape and visual

ExQ1	Question to:	Question:
Q15.0.1	Lincolnshire County Council South Holland District Council	**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.
Q15.0.2	The applicant	**Baseline** Please confirm the identity or experience of the landscape architects who conducted the desk-based research that informed the baseline conditions detailed in section 12.6 of ES Chapter 12: Landscape and Visual [APP-063].
		The company, qualifications, years of experience and a summary of previous project experience for the Scheme's LVIA lead is provided within Table 1-1 of **ES Appendix 1-3: EIA Statement of Competence** [APP-168].The lead was responsible for both the LVIA presented within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1 Rev 1) and the landscape masterplan for the Scheme presented within the **OLEMP** (Doc Ref. 7.16 Rev 2).
Q15.0.3	The applicant	**Connection to the National Grid Weston Marsh Substation Note** Can the applicant signpost to where within ES Chapter 12: Landscape and Visual [APP-063], Appendix 12-4: Landscape Assessment [APP-238], Appendix 12-6: Visual Assessment [APP-240] and Appendix 12-7: Landscape and Visual Cumulative Assessment [APP-241] the assessment of alternative GCR options which are discussed within the Connection to the National Grid Weston

ExQ1	Question to:	Question:
		Marsh Substation Note (CNGWMS) [REP1-094], are detailed, in particular to the placement of CSEC within Work 14.
		ES Chapter 12 and the appendices did not set out landscape or visual assessments of all alternative options, including Work No 14. Instead, in line with the ES Methodology, the reasonable worst case scenario relevant to the topic and receptor, and the worst-case residual effects were identified accordingly. Where a CSEC would be located within the Works No 14 area, it would always be next to a terminal pylon. Therefore, the potential effect on receptors would be viewed within the context of the overhead line pylons adjacent to it. The overhead line pylon is the main driver for the magnitude of impact identified for visual receptors within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1 Rev 1). The inclusion of a CSEC within Works Number 14 area would thereby not result in a materially worse effect, or any new effects than those already identified within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1 Rev 1). This is evidenced by the effects on receptors impacted by the pylons and CSEC's proposed within the central part of the Grid Connection Route. s. Viewpoint 23 is assessed in Table 1 of **Appendix 12-6: Visual Assessment** [APP-240] to have minor adverse effects during construction, year 1, year 15 and decommissioning stages. The Year 1 (winter) assessment states *'The Scheme's overhead line would add new vertical elements along the full extent of the western background. The cable sealing end compounds would be less conspicuous but nevertheless discernible.'* The overhead line design was considered to represent the worst-case assessment compared to an underground cable and CSEC's, for the reasons above and also because the zone of theoretical visibility would be reduced should the proposed overhead line within the Works No 14 area be undergrounded instead. The **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1 Rev 1) and appendices were prepared on that basis.

ExQ1	Question to:	Question:
		Following clarification questions from the Inspectorate, **Work No. 14 Assessment Summary** [AS-030] was prepared to outline in more detail how the optionality for Work No 14 has been considered within each of the technical ES chapters, including LVIA, and to clarify where the optionality is not considered to materially alter the assessment. The final design of the Work No. 14 area is governed by the Requirements of the **Draft Development Consent Order (DCO)** (Doc Ref. 3.1 Rev 3),the **Design Parameters** (Doc Ref. 7.4 Rev 3)and the mitigation secured through the management plans submitted with the DCO Application (refer to **Environmental Mitigation and Commitments Register** [REP1-057] for a full account of the mitigation requirements and how they are secured). Access from the public highway to the Work No. 14 area would be in accordance with **the Streets, Rights of Way and Access Plans** [AS-009] regardless of the configuration of the grid connection.
Q15.0.4	The applicant	**Work No. 14 and Cable Sealing End Compounds** The CNGWMS Note [REP1-094] proposes various options for routing the grid connection cables within Work No. 14. The options include the undergrounding of cables either to the east or west of Wool Hall. Given the grid connection cables would be in the form of pylons up to High Road, a CSEC would be required north of High Road as acknowledged in the CNGWMS Note. The CNGWMS Note states that Tier 3 visualisations have not been provided for a potential CSEC in Work No. 14, on the basis that the applicant considers such visualisations could be misleading. However, the ExA considers that the provision of a Tier 3 visualisation of the proposed CSEC in Work No. 14 would represent a reasonable worst-case scenario and is necessary to enable a robust assessment of the likely effects of a CSEC at this location within Work No.14. Furthermore, no representative viewpoint has been provided for the western arm of the GCR, limiting the ExA's

ExQ1	Question to:	Question:
		ability to fully assess the potential visual and landscape character effects associated with this part of the proposed development. Can the applicant: • Provide a Tier 1 visualisation for the western arm of the GCR north of High Road to represent views that would be experienced from receptors on High Road and Bridge Farm Cottage. • Provide a Tier 3 visualisation, with photomontages, from representative viewpoints showing the effect of the proposed CSEC positioned within Work No. 14.
		As explained within Applicant's response to Q15.0.3, the worst-case effects within the Work No. 14 area are associated with an overhead line configuration of the Grid Connection, rather than the provision of a CSEC. Notwithstanding the above, the Applicant will prepare an additional Tier 1 visualisation for the western arm of the Grid Connection Route north of High Road and a Tier 3 visualisation for a CSEC immediately north of High Road (which is where a CSEC would be most visible from existing roads) for Deadline 4.
Q15.0.5	The applicant	**400kV substation and BESS compound** The Design Parameters document [REP1-055] outlines the maximum area for the BESS compound would be 160m x 255m (40,800m2) and the maximum area for the substation area would be 230m x 170m (39100m2). However, the combined 400kV substation and BESS compound measures much larger than the combined footprint of these two elements when measuring from Figure 2-2 [REP1-024]. Please • Confirm the overall area in square meters for the 400kV substation and BESS compound. • Confirm what the additional floorspace would be used for.

ExQ1	Question to:	Question:
		• Explain why the BESS footprint is larger than the 400kV substation footprint.
		The area shown in **ES Figure 2-2** (Doc Ref. 6.2 Rev 2)shows the maximum extent within which the 400kV substation and the BESS Compound will be located within. It is not to be conflated with the separate areas provided in the **Design Parameters** [REP1-055] for the 400kV Substation (39,100m^2), and the BESS Compound (40,800m^2). The area in **ES Figure 2-2** (Doc Ref. 6.2 Rev 2) is deliberately larger than the parameters of the 400kV Substation and BESS Compound set out within the **Design Parameters** [REP1-055] to allow for appropriate flexibility for micro siting, which would occur at detailed design. The entirety of the area shown in **ES Figure 2-2** (Doc Ref. 6.2 Rev 2) would not be subject to hardstanding. The area within **ES Figure 2-2** (Doc Ref. 6.2 Rev 2)provides the maximum extent of the area within which the 400kV Substation and BESS Compound would be located, once micro siting is undertaken. The area shown in shown in **ES Figure 2-2** (Doc Ref. 6.2 Rev 2)which is not used for the BESS and 400kV Substation, or access to it would be left in its present condition. The maximum areas of each of the 400kV Substation and BESS Compound is secured by the area provided in the **Design Parameters** [REP1-055]. The BESS footprint provided in the **Design Parameters** [REP1-055] is slightly larger than the 400kV Substation footprint in order to ensure that it contains all infrastructure requirements of the BESS Compound.
Q15.0.6	The applicant	**BESS and substations** Please signpost to where within the application documents the design approach for the BESS and substation is explained, including how the chosen design, layout, scale, appearance and any embedded mitigation measures have been selected to minimise effects on landscape character and visual amenity.

ExQ1	Question to:	Question:
		The design approach for BESS and substations is explained in Sections 3, 4, 6 and 7 of the **Design Approach Document** [APP-268], detailing how context, constraints, and interactive evolution shaped the layout, scale, appearance and embedded mitigation. Section 7 evidences delivery of design principles, including landscape integration, biodiversity enhancement, and minimisation of visual effects. Additionally, Appendix 3 of the **Design Approach Document** [APP-268] details the compliance with the Horlock Rules for substation siting and design. The final parameters are secured within the **Design Parameters** [REP1-055]. The **OLEMP** (Doc Ref. 7.16 Rev 2) also secures landscape screening through landscape planting proposed along the field boundaries of the 400kV Substation and BESS Compound. This mitigation would substantially reduce and filter views of the proposed 400kV Substation and BESS Compound from nearby residential receptors and PRoW's. The final appearance of the BESS and substation compounds is also controlled through Requirement 5 (Detailed Design Approval) of the **Draft DCO** (Doc Ref. 3.1 Rev 3), which requires details of, amongst other matters, the layout, scale, external appearance, hard surfacing materials, fencing, signs and lighting to be submitted to and approved by the relevant planning authority. Requirement 5 further requires those details to accord with the **Design Parameters** [REP1-055] and requires the authorised development to be carried out in accordance with the approved details.
Q15.0.7	The applicant	**Substations, Cable Sealing End Compounds and other above ground installations** NPS EN-1 recognises at paragraphs 5.10.5 and 5.10.35 that nationally significant energy infrastructure projects can have an adverse effect on the landscape and can be visible across very wide areas. Paragraph 5.10.6 goes on to state that projects need to be designed carefully, taking account of the potential impact on the landscape having regard to siting, operational and other relevant constraints with the aim to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate. The National Policy Statement for Electricity Networks

ExQ1	Question to:	Question:
		Infrastructure (NPS EN-5) paragraph 2.9.9 recognises that new substations, sealing end compounds and other above ground installations may give rise to adverse landscape and visual effects. Please explain what measures have been taken for the choice of location and mitigation, and if required how these would be secured, to satisfy NPS EN-1 and NPS EN-5.
		The design approach for substations, cable sealing end compounds and above ground installations is explained in Sections 3, 4, 6 and 7 of the **Design Approach Document** [APP-268], detailing how context, constraints, and interactive design evolution shaped the layout, scale, appearance and embedded mitigation. Section 7 evidences delivery of design principles, including landscape integration, biodiversity enhancement, and minimisation of visual effects. The mitigation surrounding the 400kV substation and BESS Compound includes proposed bands of scattered trees and shrubs to the east a west, and a proposed band of shrubs to the north (to ensure OHLs coming into the compound are not impeded). These will help bed in the compound with the surrounding landscape and provide screening from nearby receptors such as vehicle users of Crowland Bypass. The Grid Connection Route has similarly undergone iterative refinement, informed by the Holford Rules, to minimise landscape and visual effects and increase separation from sensitive receptors where practicable. The mitigation strategy recognises that taller infrastructure cannot be fully screened without introducing planting potentially uncharacteristic of the open fenland landscape. Additionally, Appendix 3 of the **Design Approach Document** [APP-268] details the compliance with the Horlock Rules for substation siting and design, including the consideration of environmental constraints and separation from residential properties. The final parameters are secured within the **Design Parameters** [REP1-055]. These measures are secured by Requirement 5 of the **Draft DCO** (Doc Ref. 3.1 Rev 3). The proposed landscape mitigation is further detailed in the **Outline Landscape and Ecology Management Plan** [REP1-070],

ExQ1	Question to:	Question:
		which establishes the framework for its implementation, establishment and long-term management and is secured by Requirement 7 of the **Draft DCO** (Doc Ref. 3.1 Rev 3).
Q15.0.8	The applicant	**Watercourse crossings:** Can the applicant please signpost to where within ES Chapter 12: Landscape and Visual [APP-063], Appendix 12-4: Landscape Assessment [APP-238], Appendix 12-6: Visual Assessment [APP-240] and Appendix 12-7: Landscape and Visual Cumulative Assessment [APP-241] the assessment of the installation of structures for watercourse crossings is, with particular reference to the effect of the additional structures on regional, district and borough landscape character areas.
		The impact of watercourse crossings on the landscape character areas within the study area can be found detailed within Table 1 of **ES Appendix 12-4: Landscape Assessment** [APP-238]. The table notes that "*A number of additional crossings of existing watercourses / drainage channels are proposed within Land Parcels A-D resulting in localised small amendments to existing character of drainage channels*." within HLCA 9 The Fens at regional level and HLCZ FEN 2 The Eastern Fens at borough (local) level. The additional crossings are considered as part of the wider Scheme changes contributing to those assessments, rather than assigned an individual significance rating. Watercourse crossings have also been considered as part of the visual and cumulative landscape and visual assessments. Viewpoint 15 within **ES Appendix 12-6: Visual Assessment** [APP-240] identifies drainage channels as features within the landscape, whilst LCC 2-1 considers these features in the context of the cumulative assessment within **ES Appendix 12-7: Landscape and Visual Cumulative Assessment** [APP-241]. Furthermore, paragraph 1.2.12 of **ES Appendix 12-7: Landscape and Visual Cumulative Assessment** [APP-241] confirms that the susceptibility and value of landscape and visual receptors, together with the criteria used to assess the magnitude of effect, remain consistent with those adopted for the LVIA. Accordingly, the landscape elements considered within the landscape and visual assessments, including watercourse crossings and drainage

ExQ1	Question to:	Question:
		channels, are considered within the cumulative assessment framework, ensuring that their potential effects are considered alongside those of other relevant developments.
Q15.0.9	The applicant	**Landscape and visual effects** Paragraph 12.8.7 of ES Chapter 12 [APP-063] describes factors that are considered to decrease susceptibility to landscape and visual effects and reduce sensitivity to additional infrastructure. These factors include existing detracting features such as overhead lines and road infrastructure, medium to large scale field patterns, agricultural land use, raised roads and embankments, and the presence of other vertical structures such as wind turbines and church towers. Can the applicant explain how these detracting features align with the description of the landscape character baseline in section 12.6 Baseline Conditions in particular, the phrases given in paragraphs 12.6.21 regarding tranquillity across the scheme and 5km study area, paragraph 12.6.16 that the road infrastructure is of local rural roads, and paragraphs 12.6.14 and 12.6.22 regarding remoteness reduces to the north of the OL. Can the applicant also detail how much weight was ascribed to the factors listed in paragraph 12.8.7 within ES Chapter 12 [APP-063].
		The factors identified in paragraph 12.8.7 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1 Rev 1)were considered in the context of the landscape character baseline described in Section 12.6. The baseline describes the existing landscape and its qualities, whereas paragraph 12.8.7 identifies characteristics that may influence its susceptibility to the Scheme. These considerations are not mutually exclusive. The presence of existing infrastructure does not necessarily preclude tranquillity or a sense of remoteness. As described in paragraph 12.6.21, tranquillity is experienced across the Scheme and the 5km study area, notwithstanding existing human influences. Similarly, the local rural roads

ExQ1	Question to:	Question:
		described in paragraph 12.6.16 represent a degree of human influence but do not necessarily detract from the predominantly rural character of the landscape. The reduction in remoteness to the north of the Order Limits, identified in paragraphs 12.6.14 and 12.6.22, reflects geographical variation in the baseline rather than a uniform characteristic across the study area. The factors in paragraph 12.8.7, including field pattern, agricultural land use, embankments and existing vertical structures, were considered in terms of their relevance to the scale, character and context of the Scheme. Their presence does not automatically imply low landscape sensitivity or preclude adverse effects.
Q15.0.10	The applicant	**Visual receptors** The Guidelines for Landscape and Visual Impact Assessment third edition (GLVA3) outlines that baseline studies must identify the people within the area who will be affected by changes in views and visual amenity. GLVA3 lists what this may include, and this is repeated in paragraph 12.4.19 of ES Chapter 12 [APP-063]. This list includes people visiting attractions or engaged in recreation of different types. The Relevant Representations Report [REP1-074] page 156 in response to LCC-100 says that the amenity effects on Springfield Gardens and Baytree Garden Centre and Owl Centre are assessed within ES Chapter 12. Please signpost to where that assessment is set out in ES Chapter 12 and its accompanying appendices.
		Springfields Gardens and Baytree Garden Centre and Owl Centre have been considered within **ES Chapter 14: Socio-Economics and Land Use** [APP-065] in relation to potential effects on visitor attractions and recreational facilities. The potential landscape and visual effects associated with the Scheme, including the Grid Connection Route, have been assessed in **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1 Rev

ExQ1	Question to:	Question:
		1)and its supporting appendices, using representative viewpoints and visual receptor groups (refer to Viewpoint LCC 9 and associated visual effects described in Table 1-2 of **ES Appendix 12-6: Visual Assessment** [APP-240]). While these commercial properties are not individually identified by name within the LVIA, the assessment considers visual effects arising from the proposed infrastructure within the surrounding landscape. As further clarified in the Applicant's Comments on Local Impact Reports, significant visual effects are anticipated at Baytree Garden Centre and Owl Centre due to visibility of the Grid Connection Route, whereas significant visual effects are not anticipated at Springfields Gardens.
Q15.0.11	The applicant	**Proposed planting** Paragraph 5.10.6 of NPS EN-1 requires projects to be carefully designed taking account of the potential impact on the landscape having regard to providing reasonable mitigation where possible and appropriate. The scheme proposes to plant 49.80km of native hedgerows and trees across the scheme, an increase of 36.53km. The proposed hedgerow planting appears to create smaller parcels of land across the solar development of the OL than currently exist, generating potential enclosure where this is currently absent. • Can the applicant explain the methodology used to assess any potential likely significant effects resulting from mitigation planting, including how such effects have been identified, evaluated and taken into account within in ES Chapter 12 [APP-063], Appendix 12-4: Landscape Assessment [APP-238], Appendix 12-6: Visual Assessment [APP-240] and Appendix 12-7: Landscape and Visual Cumulative Assessment [APP-241] and how the mitigation planting has been considered against the existing landscape character across the OL. Examples are (but not limited to) along the northern boundary and southern boundary of

ExQ1	Question to:	Question:
		field parcel B-1-09, along the northern boundary of field parcels B-1-06 and B-1-08, along the western boundary of field parcel B-1-06 and along the northern edge of HMA3. • Can the applicant confirm the amount of new tree cover and whether this is standalone or within the proposed hedgerows.
		The assessment of landscape and visual effects arising from the proposed mitigation planting has been undertaken as part of the overall LVIA, rather than treating planting solely as a beneficial measure. The assessment considers the potential for planting to both reinforce existing landscape features and alter landscape character through increased tree and shrub cover, subdivision of fields and changes to the perception of openness. The assessment methodology is set out in **ES Appendix 12-2: LVIA Methodology** [APP-236]. The effects on landscape character, including landscape fabric and field patterns, are assessed **in ES Appendix 12-4: Landscape Assessment** [APP-238]. Effects on visual receptors are assessed in **ES Appendix 12-6: Visual Assessment** [APP-240], with cumulative effects considered in **ES Appendix 12-7: Landscape and Visual Cumulative Assessment** [APP-241]. The assessments consider the Scheme at construction, Year 1 and Year 15 of operation, allowing the effects of planting to be considered as it establishes and matures. The proposed planting has been developed with regard to the existing landscape character, including the predominantly flat, open fenland landscape, drainage channels, long-distance views and generally sparse tree cover. The planting is intended to reinforce and extend existing vegetation patterns along field boundaries and watercourses, whilst providing screening of lower elements of the solar infrastructure where appropriate. The Applicant acknowledges, however, that the introduction of new hedgerows and trees would create a greater degree of enclosure in the immediate vicinity of some Solar Development Area parcels, particularly where new planting subdivides currently open fields. This effect has been

ExQ1	Question to:	Question:
		recognised in **ES Chapter 12** (Doc Ref. 6.1 Rev 1),paragraphs 12.8.32–12.8.33, which conclude that, by Year 15, planting would increase tree and shrub cover and reduce openness locally, whilst retaining gaps for longer-distance views and the wider perceptual qualities of openness and large skies. The assessment concludes that effects on the relevant historic landscape character areas and zones would remain moderate adverse (significant). With regard to tree cover, the Scheme proposes approximately 34.6 km of bands of mixed native shrub and scattered tree planting, as described in the **OLEMP** (Doc Ref. 7.16 Rev 2). The indicative species mix comprises approximately 45% tree species and 55% shrub species. The trees will be incorporated within the mixed planting bands rather than planted entirely as standalone trees. The total number of trees cannot be determined from the indicative species mix alone and will depend on the detailed planting specification and planting densities.
Q15.0.12	The applicant	**Proposed planting** ES Appendix 12-6: Visual Assessment [APP-240] states that "effects on visual amenity would be long-term and reversible; and any changes to planting would be permanent". It is unclear from the Outline Landscape and Ecology Management Plan (OLEMP) [REP1-070] and the ODEMP [REP1-065] whether the proposed band of shrubs and scattered trees and proposed band of shrubs as shown on figure 2-2: Indicative Solar Development Area and Inter-Array Connections Layout Plan [REP1-024] are to be permanently retained beyond the decommissioning phase. Can the applicant please: • Signpost to where in the documentation it states whether this planting is to be retained beyond the life of the project. • Confirm what is meant by the phrase in Appendix 12-6 [APP-240] that changes to planting would be permanent.

ExQ1	Question to:	Question:
		• Confirm how the Landscape and Visual Impact Assessment has assessed and considered this planting within its assessment – permanent or temporary.
		As set out within **ES Chapter 2: The Scheme** (Doc Ref. 6.1 Rev 2), paragraph 2.12.6, areas of habitat and biodiversity mitigation and enhancement, as well as the permissive path delivered as part of the Scheme, would be returned to the landowners. Following this, the landowners would choose how the land is to be used and managed. To clarify further, landscape planting introduced by the Scheme would not be removed during the decommissioning phase, e.g. field boundary planting (except where limited removals may be required to facilitate decommissioning works). However, following the decommissioning phase, the landowners would choose whether to retain any planting and how to manage their land. For the purposes of the LVIA, the assessment assumes that the planting introduced by the Scheme would remain in place permanently (as its whole scale removal is not proposed as part of the decommissioning phase of the Scheme). 'Changes to planting being permanent' in **ES Appendix 12-6** [APP-240] is referring to locations where the Scheme will remove existing vegetation and these removals are permanent.
Q15.0.13	The applicant Lincolnshire County Council South Holland District Council	**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 willow, and elder. To the applicant:

ExQ1	Question to:	Question:
		• 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.
		1. Replacement of defective shrubs Paragraph 5.4.7 of the **OLEMP** (Doc Ref. 7.16 Rev 2) provides for failed or defective plants to be replaced where they perform a landscape screening function. This reflects the need to maintain the intended screening benefits of the planting throughout the operational phase. Where planting is primarily intended to provide ecological connectivity or habitat enhancement, replacement would be considered in the context of its ecological function and the objectives of the relevant planting area. These measures are secured by Requirement 7 of the **Draft DCO** (Doc Ref. 3.1 Rev 3). 2. Rationale for the species mix in Table 5-1 The indicative species mix in Table 5-1 of the **OLEMP** (Doc Ref. 7.16 Rev 2) comprises a range of native tree and shrub species selected to provide a varied planting structure, contribute to local

ExQ1	Question to:	Question:
		landscape character and support biodiversity. The inclusion of trees and shrubs of differing mature heights and forms is intended to create a varied landscape structure, provide partial visual screening and establish habitat corridors. The mix is indicative and will inform the detailed planting specification. The species mix has however been updated resultant from the published Greater Lincolnshire Local Nature Recovery Strategy. 3. Example of planting that will not be replaced The OLEMP distinguishes between planting that provides a landscape screening function and planting whose principal purpose is ecological enhancement. Replacement would be considered in light of the planting area's intended function and the objectives of the OLEMP. Planting that provides necessary screening of the Scheme would be replaced where plants fail or become defective, to maintain that function. 4.Monitoring of hedgerow health and condition Bullet point 5 in paragraph 5.4.7 of the **OLEMP** (Doc Ref. 7.16 Rev 2) has been updated for Deadline 3 to reflect the monitoring of tree and shrub health, rather than hedgerow health and condition.
Q15.0.14	Lincolnshire County Council	**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.

ExQ1	Question to:	Question:
Q15.0.15	The applicant	**Advanced Planting** Advanced planting is proposed in three locations: along sections of Martins Road, Langary Gate Road and sections of the southern and southeastern boundary of Field C-1-07. Can the applicant confirm: • Why the advanced planting along the southern boundary and southeastern boundary of field C-1-07 is not identified on Figure 2-2: Indicative Solar Development Area and Inter-Array Connections Layout Plan sheet 5 of 8 [REP1-024] or Figure 1: Outline LEMP sheet 15 of 26 in appendix 1 of the OLEMP [REP1-070]. • How much weight has been ascribed to the provision of advanced planting within ES Chapter 12 [APP-063], Appendix 12-4: Landscape Assessment [APP-238], Appendix 12-6: Visual Assessment [APP-240]. • Should advanced planting not be able to take place and provide the intended screening, how would this alter the findings of the ES. In particular, which assessments, receptors or predicted effects would change.
		Figures showing advanced planting, including **ES Figure 2-2** (Doc Ref. 6.2 Rev 2) and Annex A: Outline Landscape Masterplans within the **OLEMP** (Doc Ref. 7.16 Rev 2), have been updated for Deadline 3 to show the advanced planting along the southern and southeastern boundary of field C-1-07. Advanced planting is afforded a degree of weight within the landscape and visual assessment, particularly where it can be established before construction and provide earlier screening. **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1 Rev 1) identifies specific areas of advanced planting intended to reduce visual effects during the construction and operational phases. However, the assessment does not rely on advanced planting alone to mitigate the landscape and visual effects of

ExQ1	Question to:	Question:
		the Scheme. The assessment of effects over time also takes account of the establishment and maturation of the wider landscape mitigation planting. The assessment therefore recognises the potential benefits of advanced planting where it can be delivered in advance of construction, whilst acknowledging that the extent of mitigation will depend on its location, establishment and growth. The assumed establishment and implementation of planting should be read alongside the relevant landscape mitigation commitments and the requirements securing their delivery. **ES Appendix 12-6: Visual Assessment** [APP-240] identifies Viewpoint 9 as specifically relying on advanced planting achieving a height of 2 m by the start of construction, which is assumed to reduce the magnitude of change from High to Medium. Should the advanced planting not be implemented or fail to achieve the assumed height, this reduction in magnitude of change could not be relied upon.. Viewpoint 9 has been taken at a gap in existing screening roadside vegetation, and is the only viewpoint identified in ES Appendix 12-6 [APP-240] as specifically relying on advanced planting to achieve the closure of this gap and the assessed level of mitigation prior to construction. No other viewpoints or landscape receptors were identified as being specifically dependent on advanced planting to achieve the assessed level of mitigation. Accordingly, with the exception of Viewpoint 9, the Applicant does not consider that the absence of advanced planting would be likely to alter the conclusions of the landscape and visual assessment, although the extent of screening available during the early years of operation may be reduced pending establishment of the wider mitigation planting.
Q15.0.16	The applicant	**Environmental Statement Chapter 12**

ExQ1	Question to:	Question:
		ES Chapter 12: Landscape and Visual [APP-063] paragraph 12.6.86 is incomplete. Please provide the completed wording for this paragraph.
		Paragraph 12.6.86 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1 Rev 1)should be amended to: Table 12-5 and Table 12-6 set out the landscape and visual receptor groups covered by the assessment and their corresponding viewpoints. Existing viewpoint photography for these viewpoints is included in ES Figure 12-21 Photosheets 1-30 and ES Figure 12-22 Photosheets LCC 1-11 (Doc Ref. 6.2). Representative viewpoint locations are mapped in ES Figure 12-19 and ES Figure 12-20 (Doc Ref. 6.2).
Q15.0.17	The applicant	**Outline Landscape and Ecological Management Plan** Paragraph 5.5.2 of the OLEMP [REP1-070] appears to have some repetition from paragraph 5.4.2 given section 5.5 focuses on just band of shrubs. Can the applicant please review and amend.
		The Applicant has reviewed paragraph 5.5.2 of the **OLEMP** (Doc Ref. 7.16 Rev 2) for Deadline 3 and amended the wording to remove the reference to trees, to ensure the paragraph accurately reflects the shrub planting addressed in Section 5.5.
Q15.0.18	The applicant Lincolnshire County Council South Holland District Council	**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].

ExQ1	Question to:	Question:
		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].
		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. An additional 12 viewpoints were requested through this consultation, and whether they were produced as Type 1 or Type 3, was also discussed at a virtual meeting with LCC and SHDC on 18 September 2025. The agreed recommendations were incorporated into the assessment. The submitted Type 3 photomontages, together with the ZTVs, viewpoint photography and visual assessment, provide a proportionate and sufficiently detailed basis for assessing the likely visual effects of 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** (Doc Ref. 6.1 Rev 2). The Applicant considers that the selected photomontages adequately illustrate the nature and scale of the anticipated visual changes at representative locations. Accordingly, the visual assessment is considered robust and proportionate, and further Type 3 photomontages are not considered necessary or likely to materially alter the conclusions of the LVIA.

ExQ1	Question to:	Question:
		Engagement on this matter has been added into the Statements of Common Ground with SHDC and LCC submitted at Deadline 3 (Doc Ref. 8.10 Rev 1 and Doc Ref. 8.11 Rev 1).
Q15.0.19	The applicant	**Viewpoints 2, 5, 6, 8, 10, 13, 15, 20, 21, 27, 30, LCC 2-1, LCC3, LCC8 and LCC9** Viewpoints 2, 5, 6, 8, 10, 13, 15, 20, 21, 27, 30, LCC 2-1, LCC3, LCC8 and LCC9 have been ascribed moderate adverse (significant) effect in table 1-1 within ES Appendix 12-6 [APP-240] described as alterations that typically result in a noticeable deterioration in the existing view (based on table 12-10 in ES Appendix 12-2 [APP-236]). Explain in more detail how the assessment of moderate adverse effects is justified, particularly in relation to the scale of construction and the noticeable changes to the views across the proposed development site with particular regard to the proposed substations, BESS and overhead lines.
		The moderate adverse visual effects identified at Viewpoints 2, 5, 6, 8, 10, 13, 15, 20, 21, 27, 30, LCC 2-1, LCC 3, LCC 8 and LCC 9 reflect the assessed magnitude of visual change arising from the Scheme, having regard to the sensitivity of the relevant receptors and the nature, extent and prominence of the Scheme. The Scheme would introduce extensive solar PV development and associated infrastructure into a predominantly agricultural landscape. Whilst existing overhead lines and other built infrastructure are present in some views, the Scheme would introduce additional engineered elements, potentially altering the composition and character of the existing views. The substations and BESS compounds would introduce concentrated areas of electrical equipment, buildings and associated infrastructure, which may contrast with the surrounding agricultural landscape. The overhead lines would introduce additional elevated structures and linear features, potentially extending across open views and appearing above intervening vegetation. Their visual influence would depend on their proximity, scale and prominence within each view. The assessment therefore considers the combined influence of the solar development and associated infrastructure,

ExQ1	Question to:	Question:
		recognising that the substations, BESS and overhead lines may make a particular contribution to the magnitude of change where they are clearly visible. The assessment considers not simply whether the Scheme would be visible, but the extent to which it would alter the existing view. Relevant factors include the proximity and extent of visible infrastructure, the openness and orientation of the view, intervening vegetation, the presence of existing infrastructure and the duration of exposure. The relative importance of these factors varies between viewpoints and receptor types. The moderate adverse judgements reflect the professional assessment that the Scheme would result in a readily perceptible change and a noticeable deterioration in the existing view, without necessarily transforming the view in its entirety. The resulting significance judgements take account of receptor sensitivity and the magnitude of visual change, in accordance with the methodology set out in **ES Appendix 12-2** [APP-236]. The assessments should be read alongside the detailed viewpoint descriptions in **ES Appendix 12-6** [APP-240], the visual baseline in **ES Appendix 12-5** [APP-239], and the corresponding viewpoint photosheets in **ES Figure 12-21** (Doc Ref. 6.2 Rev 1) **and ES Figure 12-22** [APP-146], which illustrate the nature and extent of the predicted changes at the identified locations.
Q15.0.20	The applicant	**Viewpoint 8** ES Appendix 12-5 [APP-239] paragraph 1.2.37 attaches low value to this view whereas it says it is a view that is representative of residential properties which would have a high value. Please explain why a low value has been ascribed.
		The value of a view is assessed separately from the sensitivity and susceptibility of the visual receptor. In accordance with paragraphs 1.8.12–1.8.14 of **ES Appendix 12-2: LVIA Methodology** [APP-236], the value of a view is determined by consideration of factors including its scenic quality,

ExQ1	Question to:	Question:
		cultural associations, recognition, visitor use and relationship with designated or other valued features. For Viewpoint 8, the low value classification reflects the assessment of the view itself against these criteria, rather than the type of receptor represented. Although the viewpoint is representative of views experienced by residential properties, this does not automatically mean that the view has high value in landscape and visual assessment terms. The susceptibility of residential receptors is assessed as high, reflecting the particular interest and appreciation residents may have in their views from their homes. This is distinct from the value of the view, which considers its recognised quality and the characteristics of the view itself. The combination of these considerations informs the overall sensitivity of the visual receptor, as set out in Table 12-7 of the LVIA Methodology.
Q15.0.21	The applicant	**Viewpoint 10** ES Appendix 12-5 [APP-239] paragraphs 1.2.17, 1.2.25 and 1.2.45 conclude that viewpoint 3, viewpoint 5 and viewpoint 10 are of low value. However, ES Chapter 12: Landscape and Visual [APP-063] table 12-8 describes the value of public rights of way (PRoW) (Crow/7/1, Crow/17/1 and Crow/12/1 respectively) as medium with a high sensitivity. Please explain this disparity.
		These assessments relate to different, albeit related, considerations. The value of a Public Right of Way (PRoW) as a recreational resource is not necessarily the same as the value of a particular view experienced from that route. The value assigned to a view reflects the characteristics of the view itself, including its scenic quality, composition, distinctiveness and the presence of existing detracting features. In contrast, the medium value assigned to the associated PRoWs reflects their wider recreational value and the importance of the surrounding landscape to the experience of users along the routes.

ExQ1	Question to:	Question:
		Recreational users are considered highly susceptible to visual change, as appreciation of the landscape forms an important part of their recreational experience. The differing value judgements therefore relate to the distinction between the scenic quality of an individual view and the wider recreational value of the PRoW, rather than representing directly comparable assessments.
Q15.0.22	The applicant	**Photosheets** Please explain the following: • [APP-132] – Why there are no photosheets provided for viewpoints 3 and 4 for the proposed development year 1 and year 15 particularly given for viewpoint 4, the substation and overhead line would be visible in the background which is described in paragraph 1.2.20 of ES Appendix 12-5 [APP-239]. • [APP-133] – Why there are no photosheets provided for viewpoint 6 for the proposed development year 1 and year 15. • [APP-134] – Why there are no photosheets provided for viewpoints 9 and 10 for the proposed development year 1 and year 15. Please confirm why the overhead lines are not identified on viewpoint 11 and what would be the cumulative development in this viewpoint? • [APP-135] – Why there are no photosheets provided for viewpoint 13 for the proposed development year 1 and year 15. • [APP-136] – Viewpoint 15 proposed and cumulative development winter (1) and (2) are both depicting a summer view. Please comment. Furthermore, please clarify what the cumulative development is in this photosheet.

ExQ1	Question to:	Question:
		• [APP-137] – Why the substation is not marked on viewpoint 19 in Parcel D. • [APP-138] – Why there are no photosheets provided for viewpoints 21 and 22 for the proposed development year 1 and year 15 particularly given the proximity of the overhead lines. • [APP-139] – Why the Grimsby to Walpole overhead line is shown in a different colour in viewpoint 24 as this does not appear on other viewpoints. Please also confirm that the overhead line is not visible at viewpoint 25. • [APP-140] – Why there are no photosheets provided for viewpoint 26 for the proposed development winter year 1 and year 15. • [APP-141] – For viewpoint 30 please annotate the existing pylons that are within the landscape. There is also a red box dotted outline but no annotation as to what this is. Please explain. Viewpoint 30 proposed + cumulative development winter (2) has Grimsby to Walpole overhead line with a green arrow and the Weston Marsh to East Leicestershire overhead line with a pink arrow. Could this approach be adopted on other photosheets? • [APP-143] – Why there are no photosheets provided for viewpoints LCC2-2 and LCC3 for the proposed development year 1 and year 15. • [APP-144] – Why for viewpoint LLCC4 the H shaped overhead lines for Work No. 8 are not shown on these photosheets. If they are of some distance, please annotate the photosheet to indicate where the 132kV overhead line is in the context of the photos. • [APP145] – Why there is no indication of where the BESS and substation would be located on photosheets for viewpoint LCC7.

ExQ1	Question to:	Question:
		• [APP-146] – Why there are no photosheets provided for viewpoints LCC9 and LCC11 for the proposed development year 1 and year 15 particularly given the proximity of the overhead lines. Please also check if the angle shown for LCC9 on ES Figure 12-19 [APP-129] is orientated in the same manner as the photosheet. Please confirm what the red dotted line is for photosheet LCC10.
		General Response: 1. Photosheets 3, 4, 6, 9, 10, 13, 16-19, 21, 22, 27-29, LCC1, LCC2-2, LCC 3, LCC 5, LCC9 and LCC11 are not photomontages but annotated Baseline Images or 'TYPE 1 Annotated Viewpoint Photographs' according to '*Visual Representation of Development Proposals*', Landscape Institute, Technical Guidance Note 06/19, 17 September 2019. They are not photomontages and subsequently do not include Year 1 and Year 15 visualisations. This approach was agreed with the planning authorities during stakeholder engagements as detailed in **ES Chapter 12 Landscape and Visual** (Doc Ref. 6.1 Rev 1), Section 12.3 Stakeholder Engagement, Tables 12-1 to 12-3. 2. Section 1.4.5 of **ES Appendix 12-6 Visual Assessment** [APP-240] states the sequence and content of Type 1 annotated photographs and Type 3 photomontages. The legend on individual photosheets provides further information of what is shown on the Type 3 photomontages and cumulative photomontages. If visible, the Grimsby to Walpole OHL is shown photorealistic on the first cumulative photosheet and in blue colour on the second photosheet. The blue colour, including annotations, is to help the observer to identify what part of the shown developments is the cumulative development as this is not necessarily apparent in the photorealistic photosheets. This has been further explained in the legend on each photosheet. This approach has been applied to all cumulative photosheets. **Individual Response:** • [APP-132] – Refer to General Response 1 above.

ExQ1	Question to:	Question:
		• [APP-133] – Refer to General Response 1 above. • [APP-134] – Refer to General Response 1 above. Viewpoint 11: The overhead lines of the Scheme are visible in the far distance in the 'Proposed Winter (Year1)' photosheets. The cumulative Grimsby to Walpole development is also identified on the cumulative photosheets including highlighting in blue colour with annotation. Refer to General Response 2 above for further information. • [APP-135] – Refer to General Response 1 above. • [APP-136] – Viewpoint 15 states in error that cumulative photosheets are depicting 'winter' when they depict 'summer' as correctly identified. This error has been corrected and an updated **ES Figure 12-21: Photosheets - Part 6 -Viewpoints 14 to 16** (Doc Ref. 6.2 Rev 1) will be submitted at Deadline 3.n relation to cumulative development, please refer to General Response 2 above. • [APP-137] – Why the substation is not marked on viewpoint 19 in Parcel D. In accordance with Landscape Institute Technical Guidance Note 06/19, Type 1 annotated viewpoint photographs are intended primarily to illustrate the baseline view, the general extent of the Scheme and relevant features within the landscape. They are not intended to identify every individual proposed built component. Annotations have therefore been applied proportionately, focusing on components and locations relevant to understanding the view. Some proposed infrastructure is situated several kilometres from the viewpoint and would be unlikely to be individually discernible at that distance. Identifying every component could consequently introduce unnecessary visual

ExQ1	Question to:	Question:
		clutter and imply a degree of visibility or precision that the baseline photograph cannot reliably convey. The omission of individual annotations does not indicate that these components have been excluded from the LVIA, which considers the Scheme as a whole. • [APP-138] – Refer to General Response 1 above. • [APP-139] – Refer to General Response 1 above. In relation to Viewpoint 25, the proposed overhead line of the Grid Connection Corridor would not be visible from this viewpoint location. However, one of the towers of the cumulative Grimsby to Walpole would be visible as indicated in the relevant cumulative photosheet. • [APP-140] – Photosheets for Year 1 and Year 15 as well as cumulative photosheets are provided for Viewpoint 26. Please refer to **ES Figure 12-21: Photosheets - Part 10 - Viewpoints 25 to 26** [APP-140]. • [APP-141] – Refer to General Response 2 above. In addition, the photosheets for Viewpoint 30 identify between existing and proposed pylons. This can be best be seen if the individual photosheets are compared beside each other. The red dotted box indicates the maximum dimensions of the proposed Weston Marsh Substations as indicated in the legend of the cumulative photosheet winter (2). Viewpoint 30 is the only Viewpoint where the Weston Marsh to East Leicestershire (WMEL) overhead line pylons are identified. • [APP-143] – Refer to General Response 1 above.

ExQ1	Question to:	Question:
		• [APP-144] – The H shaped overhead lines for Work No. 8. are not visible in this view. The submitted Type 3 photomontages have been presented without annotations and are intended to be read alongside the Type 1 annotations. Annotating an individual Type 3 photomontage would be inconsistent with the approach applied across the visualisation package and is therefore not proposed. • [APP145] –The BESS and substation would not be visible in LCC 7. Non-visible items are not annotated in Type 3 photomontages. • [APP-146] – Refer to General Response 1 above. The angle shown for LCC 9 in ES Figure 12-19 Viewpoint Locations on OS Mapping [APP-129] and ES Figure 12-20 Viewpoint Locations on Aerial Photography [APP-130] is correct although slightly more orientated to the northwest than just west. The red dotted box indicates the maximum dimensions of the proposed Weston Marsh Substations as indicated in the legend of the cumulative photosheet summer (2).
Q15.0.23	Lincolnshire County Council South Holland District Council	**Photosheets – additional winter photograph** Please comment on the additional winter photography [REP1-079] provided and whether it affects any of the conclusions previously drawn.
Q15.0.24	The applicant	**Offset distances** ES Chapter 12 section 12.7 [APP-063], the Planning Statement Appendix D: Site Selection Report [APP-264], the Design Approach Document [APP-268] and the OLEMP [REP1-070] all refer to offset distances for dwellings. Can the applicant please:

ExQ1	Question to:	Question:
		• Explain what the offset distances were in the initial design and for which properties, and what changes/ adjustments occurred "following a review of existing views experienced by residence in proximity to the four SDA land parcels A, B, C and D" (paragraph 12.7.9 of ES Chapter 12). • Confirm which properties are being referred to in ES Chapter 12 paragraphs 12.7.13, 12.7.14 and 12.7.15 specifically. • Confirm why offset distances do not appear to have been considered for Travellers Rest for fields D-1-02, D-1-03 and D-2-01. • Explain the design process for determining the offset distances to residential properties for each SDA and explain why there is a broad range of offset distances. • Signpost to where in the submitted documentation details of the offset distances are provided for the GCR and how these were formulated. • Signpost to where within the application documentation the offset distances for PRoW are detailed and how these have been determined.
		1. The EIA Scoping Report and PEIR Chapter 3 (Alternatives and Design Evolution) confirm that separation from residential properties and other sensitive receptors was considered from the initial stages of site selection and design development. This included a 2 km exclusion distance from larger settlements during initial site selection, refinement of the Grid Connection Corridors and Inter-Array Areas to avoid residential properties and their curtilages, and consideration of panel-free buffers and landscape screening to reduce potential landscape and visual effects and glint and glare. At these early stages, the design incorporated the principle of separation from residential receptors; however, neither document identified specific numerical offsets for individual properties or provided a comprehensive schedule of the initial distances. The property-specific

ExQ1	Question to:	Question:
		offsets were developed and refined through subsequent ES design stages, informed by the emerging environmental assessments, including landscape and visual and glint and glare considerations, further desktop reviews and site surveys, consultation feedback and technical design requirements. As explained in **ES Chapter 12**, paragraph 12.7.9 (Doc Ref. 6.1 Rev 1), the form and extent of the offsets were adjusted following consideration of the existing character and orientation of views experienced from residential properties in proximity to the four Solar Development Area land parcels. The resulting distances therefore reflect a location-specific approach, taking account of the relationship between individual properties and the proposed infrastructure, existing vegetation and landscape features, and opportunities to retain open views or provide appropriate landscape mitigation, rather than the application of a uniform prescribed setback. The principal refinements included maintaining open views from Cloot House (Parcel A), increasing separation from Martins Farm and Martins Farm Cottage and properties off Hull's Drove (Parcel C), retaining substantial separation from residences along Queen's Bank (Parcels B and C), and introducing a minimum 50 m offset along Langary Gate Road (Parcel D). These measures were accompanied, where appropriate, by the removal of proposed PV infrastructure from selected fields, retention of existing agricultural land, provision of Habitat Management Areas and targeted advanced planting. The **Design Approach Document** [APP-268], Section 6.5, and the **OLEMP** (Doc Ref. 7.16 Rev 2), Section 4.2, provide further details of these refinements, including the resulting offset distances and their principal landscape and visual objectives. 2. The properties can be identified directly from the headings and descriptions in ES Chapter 12 paragraphs 12.7.13 – 12.7.15. For completeness, paragraph 12.7.11 refers to Cloot House, and

ExQ1	Question to:	Question:
		paragraph 12.7.12 to Martins Farm and Martins Farm Cottage. The residences listed are property groups identified by road or locality, rather than a definitive address-by-address schedule. 3. A specific additional residential offset was not considered necessary at Travellers Rest, located along Langary Gate Road, as the proposed PV panels are already set back from the Order Limits. The nearest proposed PV panels within field D-1-03 are located at least 50 m north from the property boundary, providing separation between the dwelling and the proposed solar infrastructure. No additional landscape and visual offsets have been applied to the PV panels within fields D-1-01, D-1-02 and D-2-01 adjacent to PRoW Flee/6/1, a bridleway running along South Holland Main Drain, having regard to landscape character and the need to balance mitigation with the efficient use of the available development area. Instead, shrub planting is proposed along the southern boundaries of these fields, which, once established, is expected to screen the majority of views towards the adjacent PV panels from the bridleway. This approach is considered appropriate to the local landscape character, as shrub planting adjacent to recreational routes is not uncharacteristic of the study area, with an example occurring along PRoW LL/11/1 Bridleway east of Queen's Bank towards Eaugate Road. The Applicant therefore considers that the existing separation at Travellers Rest, together with the proposed landscape mitigation, provides an appropriate location-specific response without requiring further offsets from the PV panels. 4. The offset distances to residential properties across the four Solar Development Area (SDA) land parcels were determined through an iterative, location-specific design process, informed by the emerging landscape and visual assessment, the review of existing views experienced from nearby

ExQ1	Question to:	Question:
		residential properties, site surveys, consultation feedback and other environmental and technical considerations. As explained in **ES Chapter 12**, paragraph 12.7.9 (Doc Ref. 6.1 Rev 1), the initial design incorporated separation from residential properties, with the form and extent of these offsets subsequently refined to respond to the existing character of views and the particular circumstances of individual locations. The design process considered the proximity and orientation of residential properties relative to the proposed PV panels, existing vegetation and landscape features, the availability of intervening land, and opportunities to retain open views or introduce appropriate landscape mitigation. This approach resulted in different offsets across the four SDA land parcels: • **Parcel A:** An approximately 50 m offset was incorporated at Cloot House to retain open views to the south and southwest, particularly from first-floor windows. • **Parcel B:** Substantial separation was retained between the proposed PV panels and residences along Queen's Bank, with offsets ranging between 400 m and 580 m across Parcels B and C. This includes the retention of intervening agricultural land and areas proposed for habitat management. • **Parcel C:** A minimum 130 m offset was incorporated at Martins Farm, with further separation of up to approximately 100 m along Martins Road, alongside the removal of PV panels from selected areas and proposed advanced planting. A minimum 80 m offset was also incorporated for properties off Hull's Drove, supported by advanced planting. • **Parcel D:** A minimum 50 m offset was introduced for residences along Langary Gate Road, supported by Habitat Management Areas and targeted planting to reduce potential visual effects and glint and glare. The broad range of offset distances reflects the differing landscape and visual circumstances of these locations, rather than a variation in the importance attached to residential amenity. In some

ExQ1	Question to:	Question:
		locations, greater separation was achievable through the retention of existing agricultural fields or the removal of proposed PV areas, while elsewhere more targeted offsets, combined with existing vegetation and proposed landscape mitigation, were considered appropriate. The offsets were therefore not determined through a uniform numerical standard, but through a proportionate design response seeking to avoid or minimise adverse visual effects while balancing the need for efficient land use, technical requirements and the retention of the characteristic openness of the fenland landscape. Further details of the resulting offsets and associated design refinements are provided in the Design Approach Document [APP-268], Section 6.5, and the OLEMP (Doc Ref. 7.16 Rev 2), Section 4.2. 5. The approach to determining separation from residential properties along the Grid Connection Route (GCR) is described in **ES Chapter 3: Alternatives and Design Evolution** [APP-054] and the **Design Approach Document** [APP-268], particularly Sections 6.3 and 6.5. The proposed overhead line (OHL) alignment and indicative pylon locations are illustrated in **ES Figure 2-4: Grid Connection Route Layout Plan** [APP-076]. Unlike the Solar Development Area, the GCR was not designed using uniform numerical residential offsets. Instead, separation distances were determined through an iterative route-selection process, considering residential proximity, landscape and visual effects, consultation feedback, the Holford Rules and engineering, safety and operational constraints. The alignment was developed to avoid residential clusters and maximise separation where practicable, including near Delgate Bank, Moulton Chapel Road, Austendike Road, Swindler's Drove and Broad Gate. As described in Section 6.5.14 of the **Design Approach Document** [APP-268], pylons 4SV11–4SV13 were realigned to increase separation from a residential property at

ExQ1	Question to:	Question:
		Delgate Bank following consultation feedback. Further refinements maintained separation from residential curtilages while accommodating the proposed Grimsby to Walpole OHL. The resulting separation distances therefore reflect location-specific constraints rather than prescribed setbacks. The potential visual effects on residential receptors are assessed in **ES Chapter 12** (Doc Ref. 6.1 Rev 1)and ES Appendix 12-6 [APP-240]. 6. The approach to providing offsets from Public Rights of Way (PRoWs) is described in **ES Chapter 3: Alternatives and Design Evolution** [APP-054] and the **Design Approach Document** [APP-268], particularly Sections 6 and 7.1.4. The latter confirms that existing PRoWs have been retained in situ, with buffers incorporated to maintain recreational amenity and safety. The extent of these buffers was informed by the iterative design process, taking account of the relationship between PRoWs and proposed infrastructure, existing landscape character and vegetation, potential visual effects, and opportunities for landscape mitigation. Rather than applying a uniform numerical offset, the design adopts a location-specific approach, balancing recreational amenity with the characteristic openness of the fenland landscape and efficient land use. The resulting layout and proposed landscape mitigation are illustrated in the **OLEMP** (Doc Ref. 7.16 Rev 2), Annex A), while potential visual effects on users of PRoWs are assessed in **ES Chapter 12** (Doc Ref. 6.1 Rev 1)and **ES Appendix 12-6** [APP-240].
Q15.0.25	The applicant	**Residential views** Paragraph 12.8.48 of ES Chapter 12 [APP-063] states that views of the proposed development from the majority of residential properties along the edges of settlements as well as scattered

ExQ1	Question to:	Question:
		houses and farmstead across the study area are either partially or fully obscured. Please confirm which part of the proposed development this paragraph is referring to (the SDA or GCR).
		This statement is referring to the whole 'Scheme'. Paragraph 12.8.48 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1 Rev 1), also clarifies that more open views can then be obtained from entrance gates or from first floor / dormer windows (if in existence) if facing towards the Scheme.
Q15.0.26	The applicant	**Residential Visual Amenity Assessment** The ExA note that a Residential Visual Amenity Assessment (RVAA) has not been undertaken. Paragraphs 12.4.41 – 12.4.50 and 12.8.45 – 12.8.53 of ES Chapter 12 [APP-063] refer to RVAA. While a significant visual effect does not necessarily mean the RVAA threshold would be crossed, given the number of receptors assessed as having significant effects, the paragraphs do not clearly demonstrate that the 4-step assessment suggested in The Landscape Institute Technical Guidance Note TGN 2/19 has been undertaken and that the outlook, orientation, principal rooms, gardens and existing screening of individual properties have been considered. Provide a more in-depth assessment in accordance with TGN 2/19, including: • Step 1 – Define the study area and identify the properties to be assessed. • Step 2 – Evaluate the baseline visual amenity of these properties. • Step 3 – Assess the likely change to this baseline and identify of which properties require further assessment. • Step 4 - Detailed further assessment of the individual properties identified in step 3 as having the greatest magnitude of change such that the Residential Visual Amenity Threshold may be engaged.

ExQ1	Question to:	Question:
		The Applicant acknowledges the Examining Authority's request for further information regarding residential visual amenity and the application of Landscape Institute Technical Guidance Note (TGN) 2/19. **ES Chapter 12** (Doc Ref. 6.1 Rev 1), paragraphs 12.4.41–12.4.50 and 12.8.45–12.8.53, explain the approach adopted within the LVIA, including the distinction between significant adverse visual effects and effects potentially reaching the Residential Visual Amenity Threshold (RVAT). The Applicant maintains that significant visual effects do not automatically indicate that the RVAT would be reached or necessitate a separate RVAA. However, to provide greater transparency regarding the consideration of individual residential properties, the Applicant will submit a supplementary 'Residential Visual Amenity Technical Note' at Deadline 4. Drawing on the existing LVIA, site survey records, representative viewpoints, visualisations and mapping, the note will provide further information on: • The identification of residential properties potentially experiencing substantial visual changes; • Their existing visual context, including orientation, outlook, proximity to infrastructure and screening, where this can be established from available evidence; • The anticipated extent of visual change, including the influence of proposed offsets and landscape mitigation; and • The basis for determining whether individual properties warrant further consideration of the RVAT. The Technical Note will provide a more detailed explanation of the professional judgements underpinning the existing LVIA conclusions, having regard to the relevant considerations in TGN

ExQ1	Question to:	Question:
		2/19. It will supplement the submitted assessment rather than constitute a separate four-step RVAA.
Q15.0.27	The applicant	**Development area and public rights of way** To assist the ExA's understanding of the interaction between the SDA, proposed and retained planting and PRoW, please overlay the definitive PRoW routes as shown on Figure 12-3: Public Rights of Way and National Cycle Network [APP-113] on to Figure 2-2: Indicative Solar Development Area and Inter-Array Connections Layout Plan [REP1-024].
		ES Figure 2-2: Indicative Solar Development Area and Inter-Array Connections Layout Plan (Doc Ref. 6.2 Rev 2) has been updated for Deadline 3 to show the public rights of way and national cycle network.
Q15.0.28	Lincolnshire County Council South Holland District Council	**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.
Q15.0.29	The applicant	**Trees** ES Appendix 12-8: Arboricultural Impact Assessment – Part 2 [APP-243] the Tree Protection Plan. Trees are identified along Moulton Mere Bank for removal however these remain unsurveyed. Please explain why these are unsurveyed and when they would be surveyed.
		The unsurveyed trees along Moulton Mere Bank were not included in the original tree survey either due to their location (e.g. outside of the draft Order Limits at the time the survey was carried out) or

ExQ1	Question to:	Question:
		because of their low stature, where they didn't qualify as tree features for inclusion in a tree survey to BS5837:2012. As stated in section 3.1.5 of **ES Appendix 12-8: Arboricultural Impact Assessment** [APP-243 and APP-243], updated tree surveys will be undertaken as required to fully inform the detailed design where there is a risk of tree impacts and this is secured via the **Outline Construction Environmental Management Plan** (**OCEMP**) (Doc Ref. 7.10 Rev 3).
Q15.0.30	The applicant	**Trees** A number of trees are identified as being impacted within ES Appendix 12-8: Arboricultural Impact Assessment – Part 1 [APP-242] due to their location being on or within a third-party centre line. Please confirm when you expect to have greater certainty regarding this matter and whether these trees would be affected/ removed.
		Greater certainty on this matter will result through the progression of detailed design, which occurs post consent. At this stage, the **Design Parameters** (Doc Ref. 7.4 Rev 3) and **Works Plans** [APP-010] secure flexibility around the third-party centre line which allows for either oversailing, or undergrounding the third-party asset if required. As the final design solution in these locations is currently unknown, and the amount of vegetation clearance required is therefore also unknown. The assessment within **ES Appendix 12-8: Arboricultural Impact Assessment – Part 1** [APP-242] has assumed that all vegetation in these locations is removed in order to undertake a reasonable worst case assessment.
Q15.0.31	The applicant	**Trees** ES Appendix 12-8: Arboricultural Impact Assessment – Part 2 [APP-243] the Tree Protection Plan. There appears to be colour coding shown on this plan that does not align with ES Figure 2-4 [APP-076]. This includes, for example:

ExQ1	Question to:	Question:
		• Sheet 5 of 30 – what are the blue areas along the internal access track? • The access track is in a different colour and the cross protection and working areas are in the same colour. Can the colours be aligned so that it is clear what these areas are for? • There are blue shapes on a number of the sheets with no numbers presented as surveyed trees. What does this represent and if they are for surveyed trees affected/ managed why do they not have a number ascribed them? • Why are assets for the pylons seemingly in one colour but the rest of the pylon assets are not?
		The illustrative design information used as an overlay on the **Tree Protection Plan** [APP-243] is more detailed than that provided in **ES Figure 2-4** [APP-076]. The purpose of **ES Figure 2-4** [APP-076] is to show Grid Connection infrastructure that would be required during the operational phase, including for any operational maintenance works. Whilst the **Tree Protection Plan** [APP-243] shows operational infrastructure, it also shows land-take required for temporary construction works, which are further illustrated on **ES Figure 2-7** (Doc Ref. 6.2 Rev 1). For example, **Tree Protection Plan** [APP-243] shows the likely spatial extent of different activities e.g. separate colours for OHL stringing locations, access routes and bell mouths etc. Furthermore, **Tree Protection Plan** [APP-243] shows further detail for certain aspects of the design, which may require vegetation removals, however which are not shown on **ES Figure 2-4** [APP-076] and **ES Figure 2-7** (Doc Ref. 6.2 Rev 1), e.g. visibility splays for accesses and temporary construction drainage on the basis of the illustrative design. The differences reflect the distinct purposes of the drawings and the graphical conventions adopted in their preparation. The **Tree Protection Plan** [APP-243] is intended to identify the relevant infrastructure in the context of the measures required to protect retained trees and other

ExQ1	Question to:	Question:
		arboricultural features during construction and the extent of vegetation removals required. Its presentation is therefore directed towards clearly communicating the relationship between the proposed infrastructure, retained vegetation and the associated tree protection measures. The proposed infrastructure represented in **Tree Protection Plan** [APP-243], **Figure 2-4** [APP-076] and **ES Figure 2-7** (Doc Ref. 6.2 Rev 1) is consistent in its underlying location, extent and function. The difference is therefore presentational only and does not represent a change to the Scheme, the extent of infrastructure assessed within the ES, or the tree protection measures to be implemented. In response to the bullets above: • On Sheet 5 of 30, **Tree Protection Plan** [APP-243], blue areas relate to watercourse enhancement buffers where there are watercourse crossings with the internal access track. • The hatching and colours on the **Tree Protection Plan** [APP-243] and **ES Figure 2-4** [APP-076] and **ES Figure 2-7** (Doc Ref. 6.2 Rev 1) have been used for different purposes, and there are different layers on each of these figures. As such, the colour scheme used on the ES figures does not directly work on the **Tree Protection Plan** [APP-243], without creating confusion in terms of symbology. E.g. **ES Figure 2-4** [APP-076] and **ES Figure 2-7** (Doc Ref. 6.2 Rev 1) use no solid fill for the overhead line limit of deviation and a hatch for the pylon stringing locations. The **Tree Protection Plan** [APP-243] however has opted to show solid fill for these areas to clearly separate them from the National Tree Map (NTM) data. Furthermore, the **Tree Protection Plan** [APP-243] has been produced in AutoCAD whilst the **ES Figure 2-4** [APP-076] and **ES Figure 2-7** (Doc Ref. 6.2 Rev 1) have been produced in ArcGIS. The formatting of colours and symbology used does not directly translate across the two separate pieces of software. • Blue shapes (e.g. those shown at the southern extent of the purple restringing hatch on sheet 8 of the **Tree Protection Plan** [APP-243]) relate to NTM unsurveyed trees which are 'affected managed' as per the key. These are considered to be small, low stature tree features which were not included within the scope of the tree survey. Updated tree surveys will be undertaken as

ExQ1	Question to:	Question:
		required to fully inform the detailed design where there is a risk of tree impacts and this is secured via the **OCEMP** (Doc Ref. 7.10 Rev 3). Because of the overlapping Scheme infrastructure layers on the **Tree Protection Plan** [APP-243], it was considered clearer to use different colours for different parts of the Scheme infrastructure, in order to be able to better distinguish between different Scheme components.
Q15.0.32	The applicant	**Trees** Please explain why there is no commitment secured within the OCEMP [REP1-061] to protect against the loss of trees protected by a TPO.
		As stated within **ES Appendix 12-8: Arboricultural Impact Assessment** [APP-242] and illustrated on the **Tree Protection Plan** [APP-243], no trees identified as subject to TPO or other statutory or non statutory tree protection designation (such as Conservation Area or SSSI status) are to be impacted by the Scheme. None of the TPOs are directly within the Order Limits and where TPOs are present immediately adjacent to the Order Limits, there are no works proposed adjacent to them. However, for completeness, the Applicant has added a commitment to protect against the loss of trees protected by a TPO into the **OCEMP** (Doc Ref. 7.10 Rev 3) at Deadline 3.
Q15.0.33	The applicant	**Trees** Paragraph 7.13.2 of ES Appendix 12-8: Arboricultural Impact Assessment – Part 1 [APP-242] states ash would be monitored annually for signs of ash dieback. Please signpost to where in the OCEMP [REP1-061] or OLEMP [REP1-070] this is detailed to ensure compliance.
		This is recommended as outline guidance in the baseline section of **ES Appendix 12-8: Arboricultural Impact Assessment** [APP-242]. Tree inspection to manage the risk from trees within the Site will be the responsibility of the Applicant and its contractors and will fall within their general

ExQ1	Question to:	Question:
		obligations to meet their duty of care. This has been added into the **OCEMP** (Doc Ref. 7.10 Rev 3) and **OLEMP** (Doc Ref. 7.16 Rev 2) which have been updated for Deadline 3.
Q15.0.34	The applicant	**Trees** Please signpost to where the protective measures as detailed in paragraph 7.5.6 and section 7.10 of ES Appendix 12-8: Arboricultural Impact Assessment – Part 1 [APP-242] can be found within the OCEMP [REP1-061].
		The protective measures detailed in paragraph 7.5.6 and section 7.10 of **ES Appendix 12-8: Arboricultural Impact Assessment – Part 1** [APP-242] are cross referenced within Table 3-9: Landscape and Visual of the **OCEMP** (Doc Ref. 7.10 Rev 3), under 'Tree Works'. This reads: *"Tree works will be undertaken in accordance with the ES Appendix 12-8: Arboricultural Impact Assessment (Doc Ref. 6.3). 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".* The **OCEMP** (Doc Ref. 7.10 Rev 3) also notes that a pre-construction tree survey will be undertaken, and an Arboricultural Method Statement will be developed for locations where construction works are likely to affect trees. This will include a final Tree Protection Plan which will contain an updated summary of arboricultural impacts associated with the detailed design, a specification for tree works and protection measures, supervision requirements and the methodology for works in proximity to retained trees.
Q15.0.35	The applicant	**Trees** Paragraph 7.13.2 of ES Appendix 12-8: Arboricultural Impact Assessment – Part 1 [APP-242] states that retained trees may require remedial works to address potential defects in areas of frequent access and, whilst this is unlikely to be onerous, is the responsibility of the tree owner. Please

ExQ1	Question to:	Question:
		explain if the retained tree is within the OL, how this sentence aligns with the subsequent paragraph 7.13.12 and also the requirements and responsibilities within the OLEMP [REP1-070].
		Paragraph 7.13.2 of **ES Appendix 12-8: Arboricultural Impact Assessment** [APP-242] identifies that retained trees may require remedial works where defects are identified that could give rise to safety concerns in areas subject to frequent access. This reflects a general arboricultural management consideration and does not create any conflict with paragraph 7.13.12 or the **OLEMP** (Doc Ref. 7.16 Rev 2). The **OLEMP** (Doc Ref. 7.16 Rev 2) (paragraphs 4.3.17 to 4.3.20) sets out the requirements for the inspection, management and maintenance of retained trees within the Order Limits, including that any necessary tree works would be conducted in accordance with industry best practice, such as BS3998:2010. The reference in paragraph 7.13.2 should therefore be read as identifying a potential management requirement, with the detailed inspection and maintenance regime secured through the OLEMP.
Q15.0.36	The applicant	**Trees** Please confirm whether there would be incursions into root protection areas given the comments made within paragraph 7.2.2 of ES Appendix 12-8: Arboricultural Impact Assessment – Part 1 [APP-242].
		As stated in paragraph 7.2.3 of **ES Appendix 12-8: Arboricultural Impact Assessment** (AIA) [APP-242], within the Grid Connection Route, trees classed as Affected/Manged or Potentially Affected (which excludes all veteran or ancient trees and all trees subject to a TPO) may be subject to an RPA incursion and this will be considered as part of the detailed design and will be documented in the Arboricultural Method Statement which is secured via the **OCEMP** (Doc Ref. 7.10 Rev 3). Where

ExQ1	Question to:	Question:
		RPA incursions within the Grid Connection Route are unavoidable this is likely to be associated with access and working space (such issues can generally be managed with ground protection measures). As detailed in Table 7.2 of the AIA, no trees in the Solar Development Area or Inter Array Connection are considered likely to be subject to an RPA incursion at this stage. A final assessment of arboricultural impacts will be documented in the Arboricultural Method Statement, secured via the **OCEMP** (Doc Ref. 7.10 Rev 3).
Q15.0.37	The applicant	**Trees** Paragraph 7.13.5 of ES Appendix 12-8: Arboricultural Impact Assessment – Part 1 [APP-242] states that the development has been designed such that it is set back from the position of retained trees to reduce or avoid the issue of shadowing with paragraph 7.13.7 going on to say that drawings illustrate there would be no/ negligible shading at the time of construction. However, paragraph 7.13.10 outlines that the detailed design stage would further consider potential for shading from trees to inform the final layout of the SDA. Please explain, that, if the extent of shading from existing trees is already known or can be reasonably predicted, why the final layout of the SDA cannot be determined at this stage. Furthermore, if post consent assessments identify shading effects from retained trees, please explain what safeguards and protection measures would be in place to ensure that those trees are not subsequently subject to removal, excessive pruning, or other significant arboricultural works in order to optimise solar generation.
		The final design and arrangement of the Solar Development Areas will be influenced by a range of factors including proximity to trees and associated shading. As stated in paragraph 7.13.7 there is anticipated to be no/negligible shading impact at the time of construction however as noted in paragraph 7.13.9 increased shading impacts may occur over time as trees grow and increase in height (e.g. post construction and during the operational lifetime of the development). The Solar

ExQ1	Question to:	Question:
		Development Area design will take this into account, as the detailed design will maximise sunlight for the solar PV panels, noting that shade from trees is typically partial and changes throughout the day and, for deciduous tree species, across the seasons. Retained trees must be protected and managed in accordance with the OLEMP (Doc Ref. 7.16 Rev 2). Section 5 of the OLEMP describes how existing and new habitats illustrated on Outline Landscape Masterplans will be protected or implemented during construction, maintained during the first five years following implementation of each planting phase and managed in the long term until decommissioning of the Scheme.

2.16. Noise and Vibration

2.16.1. The below table sets out the Applicant's response to the ExA's written questions relating to noise and vibration.

Table 2.16-1: Noise and vibration

ExQ1	Question to:	Question:
Q16.0.1	The applicant	**Noise general** ES Chapter 13 [APP-064] paragraph 13.4.9 refers to the National Grid (2021) Technical Report TR(E)564 "Development of Method for Assessing the Impact of Noise from Overhead Lines (New Build, Reconductoring, Diversion and Uprating)". Please provide a copy of this report if it is being relied upon.
		The National Grid (2021) Technical Report TR(E)564 "Development of Method for Assessing the Impact of Noise from Overhead Lines (New Build, Reconductoring, Diversion and Uprating)" has been provided within **Appendix F** of this document.
Q16.0.2	The applicant	**Noise general** Please confirm whether the noise assessment and modelling underpinning ES Chapter 13 [APP-064] have been updated to reflect the relocation of the 132kV substation being moved to Parcel B. If so, please signpost to where these amendments are reported within the application documentation and explain any implications for the assessment conclusions.
		During the PEIR and Statutory Consultation stages, the 132 kV substation was proposed to be located within Land Parcel B. The substation was subsequently relocated to Land Parcel C prior to the design freeze for the ES stage, and the noise assessment and modelling presented in **ES Chapter 13** (Doc Ref 6.1 Rev 1) reflects this revised location. Accordingly, the assessment of noise effects associated with the 132 kV substation is based on its proposed location within Land Parcel C, as illustrated in **ES Figure 2-2: Indicative Solar**

ExQ1	Question to:	Question:
		Development Area and Inter-Array Connections Layout Plan [REP1-024]. The location of the substation can also be seen on the operational noise modelling figures presented within **ES Figures 13-2 to 13-5** [APP-148 to APP-151]. The assessment conclusions presented in **ES Chapter 13 Nosie and Vibration** (Doc Ref 6.1 Rev 1) therefore relate to this revised layout.
Q16.0.3	The applicant	**Overhead Line Noise** NPS EN-5 paragraph 2.9.36 states crackle contains a wide range of frequencies typically 1 kilohertz (kHz) to 10kHz and that a hum is only likely to occur during rain when rates of rainfall exceed 1 millimetre per hour. The ExA would ask the applicant to advise at what Hz the hum (single pure tone or tones) will resonate at (will this be in the audible range) and how often is a hum, consisting of a single pure tone or tones, likely to occur?
		Operational overhead line noise may include a tonal component at approximately 100 Hz (twice the 50 Hz supply frequency) and its harmonics. This frequency is within the audible range of human hearing, however, whether the tone is perceptible at nearby receptors will depend on its sound level relative to background noise. The tonal component may be present whenever the line is energised, while audibility and magnitude are influenced by voltage, line design, distance and meteorological conditions. Corona-related audible noise is typically most pronounced during wet weather conditions which, for South Holland, is less than 450 hours per year (5%) as identified in paragraph 13.4.77 of **ES Chapter 13: Noise and Vibration** (Doc Ref 6.1 Rev 1).
Q16.0.4	The applicant	**Horizontal directional drilling** Can the applicant please: • Confirm how the locations identified within ES Appendix 2-1: Watercourse Crossing Schedule [REP1-026] and ES Figure 2-3: Watercourse Crossing Locations [APP-075] for trenchless horizontal directional drilling (HDD) works align with table 13-24: Potential HDD

ExQ1	Question to:	Question:
		Locations and Distance to Nearest Receptor in ES Chapter 13 [APP-064].Provide a figure identifying where all the HDD locations are based on the information detailed within table 13-24: Potential HDD Locations and Distance to Nearest Receptor in ES Chapter 13 [APP-064] and ES Appendix 2-1: Watercourse Crossing Schedule [REP1-026]. • Confirm whether HDD represents the worst-case trenchless crossing method in terms of potential noise effects when compared to thrust bore crossing or any other trenchless techniques referred to in paragraph 2.8.11 of ES Chapter 13 [APP-064]. Please explain how the worst-case trenchless crossing scenario has been identified and assessed within the noise assessment and provide justification for the assumptions adopted. • Explain to what purpose the HDD works are required at the locations detailed in table 13-25 [APP-064].
		Response to first bullet: Locations where cable crossings will be installed using open cut or trenchless techniques are identified in **ES Appendix 2-1** [REP1-026] and **ES Figure 2-3** [APP-075]. Although Table 13-24 of **ES Chapter 13** (Doc Ref 6.1 Rev 1) uses a different naming convention, they relate to the same crossings identified in **ES Appendix 2-1** and **ES Figure 2-3**. The below points clarify which potential HDD location relates to the identified crossings: • HDD1: Watercourse Object ID 9 (SDA) • HDD2: Watercourse Object ID 12 (SDA) • HDD3: Watercourse Object ID 119 (GCR) • HDD4: Watercourse Object ID 118 (GCR)

ExQ1	Question to:	Question:
		• HDD5: Watercourse Object ID 117 (GCR) • HDD6: Watercourse Object ID 116 (GCR) • HDD7: Watercourse Object IDs 114 (GCR) and 115 (GCR) • HDD8: Watercourse Object ID 113 (GCR) • HDD9: Watercourse Object IDs 111 (GCR) and 112 (GCR) • HDD10: Watercourse Object ID 51 (SDA) • HDD11: Watercourse Object IDs 36 (SDA) and 37 (SDA) Due to uncertainty in the routing of neighbouring cumulative developments, arising from the unconfirmed location and design of the Weston Marsh B Substation and the associated connection routing (which may require undergrounding), the proximity and extent of potential HDD activities north of High Road to nearby sensitive receptors is not yet able to be confirmed. Watercourse Object IDs 106 to 110 (GCR) and 122 to 131 (GCR), facilitated through Works No. 14 of the **Draft DCO** (Doc Ref. 3.1 Rev 3), represent where potential HDD activities may take place north of High Road. These crossings are assessed qualitatively in paragraphs 13.8.28 to 13.8.32 of **ES Chapter 13 Noise and Vibration** (Doc Ref 6.1 Rev 1). <u>Response to second bullet:</u> HDD has been considered representative of the worst-case trenchless crossing method in terms of potential noise effects due to the potential duration and required timing of the works. Once drilling has started, it may not be practicable to stop until the bore is complete due to engineering and safety requirements. Consequently, HDD operations may potentially continue over a 24-hour period, including during night-time periods. In comparison, thrust boring is generally suited to

ExQ1	Question to:	Question:
		shorter crossings due to practical limitations associated with pushing pipe sections through the ground, managing spoil and maintaining alignment over longer distances, as the bore may drift from its intended alignment, and would not require continuous 24-hour operation. HDD is therefore considered a reasonable worst-case assessment scenario in terms of the potential duration and timing of noise-generating activities, particularly where works may continue into more sensitive night-time periods. Response to third bullet: Trenchless crossings may be required where existing watercourses, roads, utilities or other constraints prevent the installation of the Scheme's underground cables using open-cut trenching methods. Where either open-cut or trenchless construction methods could be employed, the trenchless method has been assessed as the reasonable worst-case scenario, on the basis that HDD activities may be required to operate over a 24-hour period. Within the Grid Connection Route, Watercourse Object IDs 106-110, 119 and 122-131 (GCR) relate to the undergrounding of the Grid Connection. Watercourse Object IDs 111-118 (GCR) relate to the potential undergrounding of Distribution Network Operator's (DNO) assets, if at detailed design stage, oversailing them by the Scheme's 400kV overhead line is not possible.
Q16.0.5	South Holland District Council	**Assessment methodology** Can SHDC confirm whether they consider that all relevant non-residential receptors have been appropriately identified and taken forward for assessment within ES Chapter 13 [APP-064].
Q16.0.6	The applicant	**Assessment methodology** ES Chapter 13 [APP-064] paragraph 13.4.56 and table 13-10 set out the magnitude of effects for construction traffic noise as defined in Design Manual for Roads and Bridges LA111. However,

ExQ1	Question to:	Question:
		paragraph 13.4.40 states the IEMA Guidelines have been used for the assessment of construction traffic noise where an existing noise source is changed. Please confirm which guidelines and approach has been used to assess change in road traffic noise and why.
		The magnitude of change criteria presented in DMRB LA 111[15] and the IEMA Guidelines[16] are identical and, therefore, the reference to DMRB LA 111 does not affect the outcome of the assessment of construction traffic noise effects. However, the reference to DMRB LA 111 was included in error, as that guidance applies to road projects, whereas the IEMA Guidelines are applicable more generally to environmental noise assessments. **ES Chapter 13 Noise and Vibration** (Doc Ref. 6.1 Rev 1) has been updated at Deadline 3 to amend the error.
Q16.0.7	The applicant	**Noise modelling** Can the applicant confirm whether the noise modelling conducted (ES Appendix 13-3: Construction and Operational Noise Modelling Report [APP-246]) has assessed noise effects at receptors inside or outside of residential properties.
		It can be confirmed that all noise model results and corresponding noise effects are based on external noise levels. This is consistent with the assessment methodologies in BS 4142[17], which assesses sound from industrial and commercial sources at the assessment location outside a dwelling, and BS 5228-1[18], which provides guidance on the assessment of construction noise at residential receptors based on external noise levels.

[15] Highways England (2020); Design Manual for Roads and Bridges (DMRB) LA 111 – Noise and Vibration.
[16] Institute of Environmental Management and Assessment & Institute of Acoustics (2014); Guidelines for Noise Impact Assessment.
[17] British Standards Institution (2014+A1:2019); BS 4142 – Methods for rating and assessing industrial and commercial sound.
[18] British Standards Institution (2014); BS5228-1 - Code of practice for noise and vibration control on construction and open sites – Part 1: Noise.

ExQ1	Question to:	Question:
		BS4142 states that context should be applied based on absolute noise levels, which is particularly relevant at night as you cannot apply context to an exceedance of SOAEL. This consideration of absolute internal noise levels at night has been embedded into the definition of the SOAEL at a minimum external level of 40 dB $L_{Ar,Tr}$, which is presented in paragraphs 13.4.71 to 13.4.72 of **ES Chapter 13 Noise and Vibration** (Doc Ref 6.1 Rev 1)https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010169-000351-6.1 ES Chapter 13 Noise and Vibration.pdf.
Q16.0.8	The applicant	**Noise and vibration study area** ES Figure 13-1: Study Area, Receptor and Noise Monitoring Positions [APP-147] shows a Noise and Vibration Study Area outlined in a black dotted line. Please confirm which study area this relates to: • 300m cited at paragraph 13.4.15 of ES Chapter 13 [APP-064] 300m for solar and 200m for the GCR cited in paragraph 13.4.16 of ES Chapter 13, or • 50m for construction traffic cited in paragraph 13.4.17 of ES Chapter 13 Please provide a figure showing all of the study areas detailed in ES Chapter 13 [APP-064].
		ES Figure 13-1: Study Area, Receptor and Noise Monitoring Positions (Doc Ref 6.1 Rev 1) originally presented a 300 m buffer from the redline boundary to show the "Zone of Influence", which is the combination of Study Areas identified for Noise and Vibration. **ES Figure 13-1** (Doc Ref. 6.2 Rev 1) has now been updated at Deadline 3 to present all of the Study Areas individually .
Q16.0.9	South Holland District Council	**Construction noise** Significant construction noise effects are predicted at RG32, RG36 and RG60 during noise generating activities 1, 3 and 5. Paragraph 13.9.2 of ES Chapter 13 [APP-064]states that to minimise the potential for exceedances of Significant Observed Adverse Effect Level (SOAEL), temporary mobile acoustic screening around construction activities within 15m of a sensitive

ExQ1	Question to:	Question:
		receptor would be implemented as additional mitigation measures. Do you consider this represents good acoustic design in reducing the significant construction noise effect to as low as reasonably practicable?
Q16.0.10	Applicant	**Construction noise** Paragraph 13.9.2 of ES Chapter 13 [APP-064] states that significant construction noise effects are predicted at RG36 and RG60 as a result of NGA1 and at RG32 as a result of NGA3. Paragraph 13.9.3 states that following the implementation of proposed screening, it is assumed noise levels at receptors RG36 and RG32 would reduce to a level whereby noise levels would be below the SOAEL and as such, residual construction noise effects at NGA1 and NGA3 are considered to represent a minor adverse effect and are therefore not significant. Please confirm whether this would be the case for NGA1 at RG60.
		RG60 was identified as experiencing significant construction noise effects as a result of NGA1 and should have been included alongside RG36 in paragraph 13.9.3 of **ES Chapter 13 Noise and Vibration** (Doc Ref. 6.1 Rev 1)https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010169-000351-6.1 ES Chapter 13 Noise and Vibration.pdfRG60 is identified as experiencing a significant effect prior to mitigation in Table 13-30 of **ES Chapter 13 Noise and Vibration** https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010169-000351-6.1 ES Chapter 13 Noise and Vibration.pdf, which summarises the identified effects. Paragraph 13.9.3 of **ES Chapter 13** (Doc Ref. 6.1 Rev 1) has been updated for Deadline 3. Following implementation of screening, it is considered that noise levels at RG60 would reduce by a minimum working allowance of 5 dB, from 75 dB to 70 dB $L_{Aeq,T}$ and therefore below the SOAEL. As such, the residual construction noise effects at RG60 as a result of NGA1 are predicted to be minor

ExQ1	Question to:	Question:
		adverse and therefore not significant. This is presented as a residual effect in Table 13-30 of **ES Chapter 13 Noise and Vibration** (Doc Ref. 6.1 Rev 1)https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010169-000351-6.1 ES Chapter 13 Noise and Vibration.pdf.
Q16.0.11	Applicant	**Construction noise** ES Chapter 13 [APP-064] assumes a worst-case scenario whereby solar PV mounting structures would be installed on galvanised steel piles using driven piling techniques. Please confirm whether the assessment has considered the intra-cumulative effects arising from multiple simultaneous or sequential piling locations within each solar parcel (i.e. Parcel D). If so, please explain how these effects have been accounted for within the assessment, including any assumptions regarding the number, distribution and duration of piling activities, and how these have influenced the significance of the predicted noise effects.
		The noise assessment presented in **ES Chapter 13 Noise and Vibration** (Doc Ref. 6.1 Rev 1)https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010169-000351-6.1 ES Chapter 13 Noise and Vibration.pdf considers a reasonable worst-case construction scenario in which solar PV mounting structures are installed using driven piling techniques. The assessment assumes that construction activities for NGA3, including driven piling, occur simultaneously rather than sequentially across each of the four land parcels (Land Parcels A, B, C and D). The noise model also assumes that piling activities within each Land Parcel occur simultaneously with multiple piling rigs, each operating in a 100 m by 100 m area within each Land Parcel. The predicted noise levels account for the combined noise emissions from these simultaneous activities and have been used to determine the magnitude and significance of noise effects at

ExQ1	Question to:	Question:
		nearby sensitive receptors. The assessment conclusions presented in **ES Chapter 13** (Doc Ref 6.1 Rev 1) reflect this assumed worst-case scenario.
Q16.0.12	The applicant	**Operational noise** Moderate adverse (significant) effects are predicted at RG04 and RG05 due to noise emissions arising from a combination of the 400kV substation transformers and BESS containers within land parcel B, even with embedded mitigation in place. Paragraph 13.9.13 of ES Chapter 13 [APP-064] states that noise effects at RG04 and RG05 would not be significant following the incorporation of the additional mitigation measures outlined in paragraphs 13.9.11 – 13.9.12. Given the conclusions reached in paragraph 13.9.13 and the operational noise limits set out in table 13-29 Operational Noise Limits, can the applicant explain why the use of low noise transformers and BESS containers incorporating 'low noise' air cooled heat exchanger designs are presented only as potential mitigation measures rather than being secured through the DCO or another mechanism.
		Low-noise transformers and BESS containers incorporating low-noise air-cooled heat exchanger designs are presented as examples of potential mitigation measures rather than prescribed requirements. This approach allows flexibility during the detailed design stage to adopt the most appropriate mitigation solution available, including emerging technologies or alternative measures that achieve equivalent or better acoustic performance. Requirement 18 of Schedule 2 of the **Draft DCO** (Doc Ref. 3.1 Rev 3) secures the mitigated rating noise levels presented in Table 13-29 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1 Rev 1). Consequently, low-noise transformers and low-noise air-cooled heat exchanger designs are not separately secured, as the noise limits they are intended to achieve are already secured through Requirement 18.
Q16.0.13	The applicant	**Operational noise**

ExQ1	Question to:	Question:
	South Holland District Council	Table 3-10: Noise and Vibration of the OOEMP [REP1-063] states that noise monitoring of the substation, transformers, inverters and BESS would be undertaken as part of the annual maintenance regime, with the results submitted to the relevant planning authority for review. Please comment on whether, in addition to the monitoring results, details of any remedial measures identified and implemented in response to exceedances or other noise related issue should also be provided to the relevant planning authority. If not, please explain how the effectiveness of the monitoring regime and any resulting corrective actions would be reviewed and enforced.
		Table 3-10 of the **OOEMP** (Doc Ref. 7.11 Rev 2) commits to liaison with the relevant planning authority where operational noise monitoring identifies an increase in plant noise levels beyond those presented in the ES. This includes agreeing and implementing appropriate maintenance or mitigation measures, followed by the submission of revised monitoring results to demonstrate that noise levels have returned to, or are below those presented in the ES. For clarity, the Applicant has amended Table 3-10 of the **OOEMP** (Doc Ref. 7.11 Rev 2) at Deadline 3 to explicitly confirm that details of the remedial measures implemented would also be provided to the relevant planning authority alongside the revised monitoring results. This would enable the relevant planning authority to review both the corrective actions undertaken and the subsequent monitoring results to verify their effectiveness.
Q16.0.14	The applicant	**Operational noise** In responding to SHDC-040 within the Relevant Representations Report [REP1-074], it states monitoring locations would be agreed with the relevant stakeholder during design. Please signpost to where within the control documents this is detailed.
		The **OOEMP** (Doc Ref. 7.11 Rev 2) has been updated for Deadline 3 to include a commitment to agree noise monitoring locations with the relevant stakeholder.

ExQ1	Question to:	Question:
Q16.0.15	The applicant	**Operational plant noise** ES Chapter 13 [APP-064] Table 13-14: Operational Plant Noise Lowest Observed Adverse Effect Level (LOAEL) and SOAEL states for the nighttime period, that a SOAEL would be noise levels greater than 10 decibels (dB) above the background sound level with a minimum of 40 dB Lar, Tr. In accordance with paragraph 13.4.72 of ES Chapter 13, should it not be a *maximum* of 40 dB?
		An external noise level of 40 dB $L_{Ar,Tr}$ is defined as the minimum night-time SOAEL for operational plant noise. This approach assumes 10 dB attenuation through a partially open window, consistent with the example assessments presented in Table A.6 of BS 4142:2014+A1:2019, resulting in an internal noise level of 30 dB $L_{Ar,Tr.}$ This is broadly consistent with the 30 dB $L_{Aeq,8h}$ guideline value in BS 8233:2014 for good sleeping conditions. BS 4142 states that a rating level around 10 dB above the measured background sound level ($L_{A90,T}$) is likely to be an indication of a significant adverse impact. Accordingly, the SOAEL has been defined as the higher of either 10 dB above the measured background sound level or 40 dB $L_{Ar,Tr}$ externally. The minimum SOAEL of 40 dB $L_{Ar,Tr}$ externally (equivalent to approximately 30 dB internally with a partially open window) has been adopted on the basis that significant effects on health and quality of life are not anticipated below this level. This represents a conservative approach, as the BS 4142 rating level includes any applicable acoustic character corrections (3 dB in this assessment), whereas the BS 8233 guideline relates to the specific noise level without such corrections.
Q16.0.16	The applicant	**Overhead line noise criteria for different receptors** Please confirm what the dissipation rate is for the criteria set out in ES Chapter 13 [APP-064] table 13-14: Tier 2 Overhead Line Noise Criteria for Different Receptors. Please also confirm whether the noise level is experienced at the receptor or on the overhead line.

ExQ1	Question to:	Question:
		The criteria presented in Table 13-16 (relating to Tier 2 Overhead Line Noise Criteria for Different Receptors) of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1 Rev 1) do not include a "dissipation rate". Rather, they comprise receptor-based noise criteria derived from TGN(E)322 for areas experiencing fewer than 450 annual average wet hours. The values presented in the table represent overhead line noise levels at the receptor and are used to determine the significance of effect on different receptor types.
Q16.0.17	The applicant	**Overhead line noise** ES Chapter 13 [APP-064] paragraph 13.8.70 identifies ten residential receptors that are predicted to experience moderate adverse significant effects as a result of noise from the proposed overhead lines. Paragraphs 13.9.15 – 13.9.17 within ES Chapter 13 set out a number of mitigation measures that could be incorporated during detailed design of the overhead line infrastructure to reduce noise impacts. Whilst the ExA notes the applicant's commitment to undertake a Tier 3 assessment in accordance with TGN(E)322, and this is secured in the OOEMP [REP1-063] can the applicant explain why the specific mitigation measures identified in ES Chapter 13 have not also been included in the OOEMP? In particular, given that these measures are included in the Environmental Mitigation and Commitments Register [REP1-057] at NV-4.
		As there is potential for significant effects to occur as a result of overhead line noise, mitigation measures listed in paragraphs 13.9.15 – 13.9.17 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1 Rev 1 provide examples of methods that may be adopted so that significant effects can be avoided. However, as the overhead line is subject to detailed design, specific mitigation measures for operational noise from overhead lines have not been included in the **OOEMP** (Doc Ref. 7.11 Rev 2). The Tier 3 assessment of overhead line noise, as committed to in Table 3-10 of the **OOEMP** (Doc Ref. 7.11 Rev 2), will be undertaken post-consent and will identify any specific measures required to

ExQ1	Question to:	Question:
		mitigate overhead line noise that will be incorporated into the final design. Notwithstanding the detailed design of these measures, compliance with the operational noise limits set out in Section 13.9 of **ES Chapter 13 Noise and Vibration** (Doc Ref. 6.1 Rev 1) is secured through the **OOEMP** (Doc Ref. 7.11 Rev 2) and Requirements 13 and 18 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). The final design will therefore incorporate any necessary mitigation to achieve these limits.
Q16.0.18	The applicant	**Overhead line noise** Please confirm the type of conductor that has been assumed within the assessment presented in ES Chapter 13 [APP-064]. Explain how this conductor was selected and whether any alternative conductor technologies, capable of achieving the same or a higher level of operational performance while resulting in lower noise emissions when installed on standard lattice pylons, were considered. If alternative technologies were assessed, please explain why they were discounted. Please also comment on whether the proposed conductor specification represents a key design parameter and if so, whether it should be secured and clearly identified within the Design Parameters document
		Section 5.2 of **ES Appendix 13-3: Construction and Operational Noise Modelling Report** [APP-246] sets out the assumptions used in the overhead line noise calculations, including the use of twin 400 mm² ACSR Zebra conductors. This conductor type is commonly used on the UK high-voltage transmission network and provides a reasonable basis for the prediction of overhead line audible noise in the absence of a detailed overhead line design. As such, alternative conductor technologies were not assessed as part of the Environmental Statement and no alternative conductor technologies were discounted. The final conductor specification will be determined at the detailed design stage, taking account of electrical, mechanical, operational, environmental and economic considerations. As such, the conductor specification is not proposed to be identified within the **Design Parameters** (Doc Ref. 7.4

ExQ1	Question to:	Question:
		Rev 3), however, compliance with operational noise limits set out in Section 13.9 of **ES Chapter 13** (Doc Ref 6.1 Rev 1) is secured through the **OOEMP** (Doc Ref. 7.11 Rev 2) and Requirements 13 and 18 of the **Draft DCO** (Doc Ref. 3.1 Rev 2).
Q16.0.19	The applicant	**Road traffic noise** ES Chapter 13 [APP-064] paragraph 13.8.37 states that changes in road traffic noise have only been calculated for roads with traffic flows of greater than 1000 annual average weekday traffic. For roads below this threshold, calculation of road traffic noise is unreliable. A qualitative assessment was then undertaken based on average hourly construction traffic flows. The paragraph states this is presented in Appendix 13-3 [APP-246]. Please confirm which roads the qualitative assessment has been conducted for and please signpost to where this information is presented in ES Appendix 13-3.
		As presented in Table 4-1 of **ES Appendix 13-3** [APP-246], road links L2, L6, L8, L9, L12, L13, L17, L19, L20, L24, L26, L27, L28, L29 and L32 each have traffic flows of less than 1,000 Annual Average Weekday Traffic (AAWT). Qualitative assessments of construction traffic noise effects have been undertaken for low-flow roads where construction traffic associated with the Scheme is present. No separate assessment has been undertaken for road links L2, L6, L8, L9, L12, L13, L17, L19, L20, L28 and L29, as traffic flows on these links are unchanged between the 2031 Baseline and 2031 Baseline with Construction Traffic scenarios. Qualitative assessments have been undertaken for road links L24, L26, L27 and L32. The assessments for L26 and L27 are presented in paragraph 13.8.38, while those for L24 and L32 are presented in paragraphs 13.8.39 to 13.8.41 of **ES Chapter 13** (Doc Ref 6.1 Rev 1).
Q16.0.20	The applicant	**Road traffic noise**

ExQ1	Question to:	Question:
		For ES Appendix 13-3 [APP-246], please explain: • What time period table 4-1: Construction Traffic Noise Assessment Data covers e.g. is this over the course of one day. • Are the cumulative development flows for total vehicles and HGVs within table 4-2: Cumulative Development Construction Traffic Noise Assessment Data for the cumulative schemes identified on figure 4-2: Short List of Cumulative Schemes within 5km Radius [APP-087]. • Why L24, L26, L27 and L32 are not included in table 4-3: Cumulative Development Construction Traffic Noise Assessment Results.
		In **ES Appendix 13-3** [APP-246], Table 4-1 presents the highest forecast construction traffic scenario (peak) road traffic flows in an Annual Average Weekday Traffic (AAWT) format which presents the number of vehicles travelling in both directions of a road within an 18-hour period from 06:00 to 00:00. The cumulative development flows presented in Table 4-2 of **ES Appendix 13-3** [APP-246] include traffic flows from cumulative developments ID05 (EN020036), ID06 (EN010130), ID07 (EN0210003) and ID21 (H16-0521-23), as identified in **ES Appendix 15-6** [APP-253]. **ES Appendix 15-5** [APP-252] and **ES Chapter 15: Traffic and Access** (Doc Ref 6.1 Rev 1), Section 15.11 provide an explanation of which of the short-listed cumulative schemes were screened into the cumulative traffic flows assessment (and subsequently, cumulative noise and air quality road traffic assessments). L24, L26, L27 and L32 were assessed qualitatively in the cumulative effects assessment and separately in paragraphs 13.8.38 to 13.8.41 of **ES Chapter 13 Noise and Vibration** (Doc Ref. 6.1 Rev 1)https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010169-000351-

ExQ1	Question to:	Question:
		6.1 ES Chapter 13 Noise and Vibration.pdf. As can be seen in Table 4-2 of **ES Appendix 13-3** [APP-246], these road links have no (0) cumulative development traffic flows and therefore the cumulative assessment effects remain the same as the residual effects for these road links.
Q16.0.21	The applicant	**Sensitive receptors** Please confirm whether RG01 or RG02 shown in table 13-5 of ES Chapter 13 [APP-064] is Cloot House and what the other sensitive receptor would be.
		This is an error within Table 13-5 of **ES Chapter 13: Noise and Vibration** (Doc Ref 6.1 Rev 1). RG01 is Little Lodge Farm and RG02 is Cloot House. **ES Chapter 13** (Doc Ref 6.1 Rev 1) has been updated at Deadline 3.
Q16.0.22	South Holland District Council	**Mitigation measures during the operational phase** Please comment on the proposed embedded mitigation measures and additional mitigation and enhancement measures detailed within section 13.7 and 13.9 of ES Chapter 13 [APP-064] and whether they demonstrate good acoustic design for the proposed development.
Q16.0.23	South Holland District Council	**Mitigation measures during the construction phase** Please comment on the proposed mitigation measures to mitigate construction noise impacts, including HDD, as detailed within table 3-10: Noise and Vibration within the OCEMP [REP1-061] and whether they are the most appropriate construction methods.
Q16.0.24		**Decommissioning noise**

ExQ1	Question to:	Question:
	South Holland District Council	Please comment on the assertion made in paragraph 13.8.79 of ES Chapter 13 [APP-064] that decommissioning works removing concrete foundations are comparable to those identified in the construction noise assessment for NGA6 (construction of overhead line).
Q16.0.25	The applicant All local authorities	**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.

ExQ1	Question to:	Question:
		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, including whether they consider the approach to be robust and adequately justified.
		Construction traffic vibration is influenced by a range of factors, including vehicle type, speed and road surface condition. In addition, the level of vibration experienced at a receptor is influenced by the separation distance between the road and receptor, local ground conditions, foundation type and building construction. Due to these uncertainties, it is a common approach to scope out construction and decommissioning traffic vibration on the assumption that traffic routes will be well maintained and free of major road imperfections such as potholes. This approach does not represent an underestimation of construction traffic vibration effects but reflects the uncertainty of predicting vibration levels arising from temporary traffic movements and the assumption that significant road defects will not arise. Paragraph 7.4.2 of the **OCTMP** (Doc Ref. 7.13 Rev 1) contains a commitment to undertake road condition surveys pre-construction, during construction and post construction. Road condition surveys are proposed to establish a baseline record of the highway condition and identify any damage attributable to construction traffic, rather than as a vibration mitigation measure. Where significant defects (i.e. potholes) are identified that have the potential to contribute to vibration effects, the Applicant would notify the relevant highway authority so that they can take appropriate action given that the existing condition of the local roads are outside of the Applicant's direct control. On this basis, and taking account of the temporary nature of construction and decommissioning traffic movements, it was concluded that significant adverse vibration effects from construction and decommissioning traffic were unlikely and that a separate assessment was not required.

ExQ1	Question to:	Question:
Q16.0.26	The applicant	**Construction vibration** ES Chapter 13 [APP-064] paragraphs 13.4.57 – 13.4.62 describe the construction and decommissioning vibration criteria. Please confirm if these paragraphs include or exclude traffic borne vibration.
		The construction and decommissioning vibration criteria were referenced from BS 5228-2. While BS 5228-2 provides guidance on construction vibration and associated effect criteria, it is principally intended for vibration arising from construction activities and plant rather than road traffic using the public highway. Although the criteria could be used as a benchmark for assessing traffic-induced vibration, traffic-induced vibration was scoped out for the reasons set out in response to Question Q16.0.25.
Q16.0.27	The applicant	**Construction vibration** ES Chapter 13 [APP-064] paragraph 13.4.49 states the closest receptor to any piling activity associated with the construction of the BESS or substation compounds is RG33 at approximately 340m. Please confirm what the distance is between the BESS and 400kV substation and RG04, the distance between the 132kV substation located in parcel C and RG07 and what levels of vibration level are expected to be experienced at those receptors from constructing the BESS and substations.
		Driven piling has been assumed for the construction of the BESS and substation compounds and pylons as a worst-case scenario for vibration. RG04 is located approximately 480 m northwest of the 400 kV substation in Land Parcel B, where a peak particle velocity (PPV) of 0.2 mm/s is predicted. RG07 is located approximately 470 m east of the 132 kV substation in Land Parcel C, where a PPV of 0.2 mm/s is also predicted. At both receptors, these vibration levels would represent negligible, not significant effects.

ExQ1	Question to:	Question:
Q16.0.28	The applicant	**Construction vibration** ES Chapter 13 [APP-064] paragraphs 13.8.50 and 13.8.51 state that vibration levels associated with percussive works are predicted to exceed the SOAEL at RG29, which is located approximately 20m from the proposed works within parcel D. The ExA notes the principal mitigation measure identified is the provision of prior warning to receptors in advance of the works. Can the applicant confirm whether additional mitigation measures have been considered, such as restrictions on the timing of works, duration or sequencing of the works, to further reduce potential significant effects? The ExA also requests confirmation of whether RG30 would be expected to experience similar vibration effects as a result of the proposed percussive works.
		The potential for additional mitigation measures, including restrictions on working hours, duration and sequencing of piling works, has been considered. However, these measures would not directly reduce the vibration levels generated by percussion piling and would therefore not change the predicted magnitude of vibration effects. The predicted exceedance of the SOAEL is based on a worst-case piling location, with exposure at the closest receptor expected to be short-term (less than one day). As set out in paragraph 13.8.51 of **ES Chapter 13 Noise and Vibration** (Doc Ref. 6.1 Rev 1)https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010169-000351-6.1 ES Chapter 13 Noise and Vibration.pdf, advance notification of the timing and duration of vibration-generating activities is proposed in accordance with BS 5228-2, which identifies that higher levels of vibration can be tolerated if prior warning and explanation has been given. While this measure would not reduce vibration levels, it would help manage the effects on residents by providing an opportunity to prepare for and better tolerate the potential temporary disturbance. The proposed approach is therefore considered appropriate given the short duration of the predicted exceedance.

ExQ1	Question to:	Question:
		RG30 is located approximately 250 m east of Land Parcel D where percussion piling may take place during the installation of PV mounting structures for NGA3. As this distance is beyond that which the LOAEL is potentially exceeded (52 m as listed in paragraph 13.8.45 of **ES Chapter 13 Noise and Vibration** (Dc Ref. 6.1 Rev 1)https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010169-000351-6.1 ES Chapter 13 Noise and Vibration.pdf), vibration levels would be equivalent to a negligible and not significant effect.

2.17. Socio-Economic Effects

2.17.1. The below table sets out the Applicant's response to the ExA's written questions relating to socio-economic effects.

Table 2.17-1: Socio-economic effects

ExQ1	Question to:	Question:
Q17.0.1	The applicant	**Outline Public Rights of Way Management Plan** Paragraph 2.2.2 of the Outline Public Rights of Way Management Plan (OPRoWMP) [AS-026] refers to Common Land being included in the assessment and table 3. Please update this paragraph to include the correct table reference that should be referred to.
		The table reference has been corrected within the **Outline PROW Management Plan** (Doc Ref. 7.15 Rev 2) submitted at Deadline 3.
Q17.0.2	The applicant	**Operational phase - Gross Value Added** The applicant identifies £22.3 million of net national Gross Value Added (GVA) and £8.9 million of net local GVA arising from the construction of the proposed development. Please clarify whether the net additional GVA arising during the operational phase of the proposed development has been assessed. If operational phase GVA has not been quantified, please explain why not, having regard to the anticipated operational lifetime of the proposed development and the potential for on-going employment, operation and maintenance and local supply-chain effects.
		The net additional GVA arising from the operational phase of the Scheme has not been assessed. As outlined within **ES Appendix 1-1: EIA Scoping Report** [APP-166], whilst GVA generation during construction and decommissioning of the Scheme was scoped into the EIA, GVA generation during operation was not scoped in. This scope reflects the Scheme is not expected to have a significant effect in terms of additional GVA generated (which is a function of the jobs generated and their

ExQ1	Question to:	Question:
		productivity), when placed in the context of the wider East Midlands economy (which as noted in **ES Chapter 14: Socio-Economics and Land Use** [APP-065] had a total estimated GVA of almost £140 billion in 2022). This is a proportionate approach and typical of that taken for other NSIPs. Notwithstanding the above, there would be GVA benefits associated with the operational phase of the Scheme, which is expected to generate a net gain of 11 full-time equivalent jobs during operation. Workers directly employed by the solar scheme are likely to be reasonably skilled, and so annual GVA per worker is likely to be reasonably high. These direct GVA benefits, as well as the indirect and induced benefits for the supply chain and local businesses, would continue to be generated for the anticipated 40-year operational lifetime of the Scheme.
Q17.0.3	The applicant	**Grazing** Table 2-5 of the Outline Skills, Supply Chain and Employment Plan (OSSCEP) [REP1-072] identifies a range of potential jobs and skills that may be required during the construction, operation and decommissioning phases. In relation to the operational phase, it states that there may be a requirement for a shepherd to oversee grazing, where grazing is used as part of the land management regime. Whilst it is noted that grazing would not be relied upon as a mitigation measure for grassland management, please signpost where the potential introduction of grazing has been assessed within the ES.
		Grazing is considered within **ES Chapter 5: Agriculture and Soils** [REP1-014] and referenced as a land management option within the **OLEMP** (Doc Ref. 7.16 Rev 2) (see paragraphs 5.6.8 and 5.6.10). Grazing does not influence the assessment of effects in the ES, and therefore is not assessed in the ES, but the Applicant has ensured that the Scheme has been designed to allow grazing (for example,

ExQ1	Question to:	Question:
		the **Design Parameters** (Doc Ref. 7.4 Rev 2) commit to a minimum 0.8m height of the lower edge of the solar PV module which allows sheep to easily move beneath and within solar PV areas).
Q17.0.4	The applicant	**Grazing** Please clarify the anticipated source of the livestock required for the proposed grazing and confirm whether any landowners have expressed an interest in providing or grazing sheep on their land. Where applicable, please provide details of any discussions or agreements reached with landowners in this regard.
		The Applicant has not yet identified a specific source of livestock for grazing. Given the principal farming type in this area is arable, the Applicant has not undertaken detailed discussions with potential graziers at this stage. However, the Applicant has discussed the proposed grazing approach with landowners within the Solar Development Area, who have indicated that they anticipate there will be interest in grazing sheep on the land during operation of the Scheme. No agreements, licences or other arrangements have been entered into and no landowner has committed to providing or grazing livestock on the land. The appointment of any grazier would be considered closer to commissioning of the Scheme. Sheep grazing is a well-established and practical method of vegetation management on solar farms, and therefore remains the Applicant's preferred method of managing the grass during operation. Potential grazing arrangements will therefore be explored at a later stage, including through discussions with local graziers and other suitable providers.
Q17.0.5	The applicant	**Travel time and accommodation**

ExQ1	Question to:	Question:
		The response to LCC in the 'Applicant's Comments on Local Impact Report' [REP2-015] in light of their concerns regarding the 60-minute drive time [REP1-106] is noted. Please confirm what mileage assumption has been used in respect of the travel to work area.
		The Applicant confirms that no single mileage figure or fixed straight-line radius has been applied around the Scheme to define the travel to work area. Rather, the 60-minute drive time study area has been used, with drive time reflecting the area from which the Scheme can realistically be reached within 60 minutes having regard to the road network, road types and typical driving conditions, including traffic, that a vehicle would be expected to experience. This approach is a consistent with that undertaken for other solar NSIP DCOs. This produces an irregular catchment area rather than a uniform circle, as shown in **ES Figure 14.7: 60-Minute Drive Time from the Site** [APP-158]. As a result, the study area extends to varying distances in different directions depending on the road network available. Broadly, it extends to approximately 35 to 40 miles from the Scheme at its furthest extent, and it is less in some places including where it reaches the coast to the east.
Q17.0.6	The applicant	**Job creation - operation** The ExA notes that the number of construction and operational jobs to be generated by the proposed development is lower than other solar developments of a similar scale. Please provide further justification for the level of employment to be generated, explaining any project-specific factors that may have influenced the low level of operational job numbers.
		The construction job estimates set out in **ES Chapter 14: Socio-Economics and Land Use** [APP-065] are based on workforce estimates provided by the Applicant's design team in 2025, reflecting the construction activities anticipated as required for the Scheme at that point in the design process. It is worth noting that **ES Chapter 14: Socio-Economics and Land Use** [APP-065] sets out the average number of workers required per annum when assessing the economic impacts of the Scheme. While this is the typical approach within such assessments, the Scheme has a longer programme than some

<table>
<tr><th>ExQ1</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td></td><td>
other solar developments of a similar scale (approximately four years, compared for example to two-three years for the nearby solar NSIPs outlined in the table below). This results in a lower average jobs figure.

The operational jobs estimate was provided by the Applicant, based on their experience and understanding of the workforce needed to operate and maintain the Scheme. The figure of direct 10 jobs does not appear to be substantially lower than the estimates for similar solar developments within their Environmental Statements.

The table below outlines how the estimate of gross direct operational jobs required for the scheme is broadly in line with other nearby solar NSIPs. Additionally, when factoring in the longer construction programme, the required number of construction jobs per year is not substantially lower than all nearby solar NSIPs, with Steeple Renewables Project requiring a smaller average workforce even with a notably shorter construction programme.
<table>
<tr><th>Solar NSIP</th><th>Gross direct construction jobs per year</th><th>Gross direct operation jobs per year</th><th>Hectares (including grid connection)</th><th>Construction programme (months)</th></tr>
<tr><td>The Scheme (Meridian Solar)</td><td>184</td><td>10</td><td>1,616</td><td>36–48</td></tr>
<tr><td>Heckington Fen Solar Park (EN010123)</td><td>436</td><td>6.5</td><td>644</td><td>30</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>ExQ1</th><th>Question to:</th><th>Question:</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Beacon Fen Energy Park (EN010151)</td><td>556</td><td>12</td><td>757.6</td><td>24–36</td></tr>
<tr><td>Steeple Renewables Project (EN010163)</td><td>164</td><td>0</td><td>888.3</td><td>24</td></tr>
<tr><td>Fosse Green Energy (EN010154)</td><td>350</td><td>4</td><td>1,421</td><td>24</td></tr>
<tr><td>Tillbridge Solar (EN010142)</td><td>812</td><td>10</td><td>1,670</td><td>24</td></tr>
<tr><td>Cottam Solar Project (EN010133)</td><td>467</td><td>11</td><td>1,270</td><td>24</td></tr>
</table>
</td></tr>
<tr><td rowspan="2">Q17.0.7</td><td rowspan="2">The applicant</td><td>Job creation - operation

Reference is made to the creation of 10 FTE operational jobs. However, other documents refer to 11 FTE operational jobs. Please clarify and explain the basis for the differing figures.</td></tr>
<tr><td></td></tr>
</table>

ExQ1	Question to:	Question:
		The Applicant confirms that both figures are correct and relate to different stages of the same employment calculation, both of which are explained in **ES Chapter 14: Socio-Economics and Land Use** [APP-065]. The figure of 10 refers to the gross number of operational jobs directly created by the Scheme, before any adjustment for additionality. The figure of 11 refers to the total net employment effect of the Scheme during operation, after the application of the additionality assumptions set out in Table 14-4 of **ES Chapter 14: Socio-Economics and Land Use** [APP-065]. The steps within the calculation are clarified as follows. The gross figure of 10 direct jobs is adjusted for leakage and displacement to arrive at a net direct employment figure. A multiplier is then applied to this net direct figure to account for the additional indirect and induced employment supported in the wider supply chain and local economy as a result of the Scheme's operation. In this instance, the application of the multiplier to the net direct employment figure results in a total net employment figure of 11.
Q17.0.8	The applicant	**Outline Skills, Supply Chain and Employment Plan – Opportunity 7: Ethical Procurement Policy** Section 4 of the OSSCEP [REP1-072] identified Opportunity 7 as seeking to ensure that the workforce is treated equitably by having an ethical procurement policy. Please clarify how Opportunity 7 is a specific opportunity arising from the proposed development, rather than reflecting existing statutory obligations and good practice measures relating to equality, employment and procurement?
		The Applicant confirms that Opportunity 7 goes beyond existing statutory obligations and good practice. The statutory duty under section 54 of the Modern Slavery Act 2015 requires a qualifying supplier to publish an annual slavery and human trafficking statement, and imposes no further obligation as to how that statement is produced, nor any requirement for due diligence, risk assessment, staff training, or contractual control over suppliers. The ethical procurement policy

ExQ1	Question to:	Question:
		proposed under Opportunity 7 includes a number of specific commitments that are not themselves required by the Modern Slavery Act 2015, including: • participation in a modern slavery supplier due diligence exercise as part of the tender process; • a requirement for the statement to be informed by a risk assessment; • a requirement for each qualifying supplier to have its own modern slavery policy and to provide relevant employees with modern slavery training; • contractual warranties regarding the absence of slavery, forced labour, labour exploitation or human trafficking and compliance with employment and minimum wage law; • an obligation to report suspected instances of these practices anywhere in the supplier's business or supply chain; and • a right of audit, a right to require a supplier action plan, and a right of immediate termination in the event of non-compliance. As the Skills, Supply Chain, and Employment Plan would be secured as a requirement of the **Draft DCO** (Doc Ref. 3.1 Rev 3), the Applicant has enforceable means of securing ethical procurement standards across its supply chain, rather than relying on each qualifying supplier's independent compliance with its own statutory obligations.

2.18. Transportation and Traffic

2.18.1. The below table sets out the Applicant's response to the ExA's written questions relating to transportation and traffic.

Table 2.18-1: Transportation and traffic

ExQ1	Question to:	Question:
Q18.0.1	The applicant	**Junction receptors** Please provide a figure showing the location of the junctions as referred to in table 15-5 of ES Chapter 15: Traffic and Transport [APP-066].
		As set out in **ES Chapter 15** (Doc Ref. 6.1 Rev 1), paragraph 15.4.7, "*Table 15-4 and Table 15-5 below list the link and junction receptors which have been considered as part of this assessment. The locations of the respective traffic surveys which provide the traffic flow data for these receptors are shown in ES Figure 15-1.*" To improve clarity, **ES Figure 15-1** (Doc Ref. 6.2 Rev 1) has been updated for Deadline 3. The updated figure includes an additional sheet (sheet 3) with appropriate cross-referencing to the link and junction receptors assessed within Tables 15-4 and 15-5. This update enhances the clarity of the Figure by ensuring that the corresponding locations of the receptors can be readily identified.
Q18.0.2	The applicant	**Heavy goods vehicle and abnormal indivisible load routing** Please clarify why the abnormal indivisible load (AIL) routing shown on ES figure 2-5 [APP-077] is different to that shown on ES figure 15-4 [APP-162] west of access point HR-03 and the A16 north of Spalding. Please also further clarify why different figures (figures 1 and 2) have been provided within the SoCG with National Highways [REP1-086] and whether it is necessary for these figures to be submitted into the examination.

ExQ1	Question to:	Question:
		The Applicant acknowledges the discrepancy identified by the Examining Authority between **ES Figure 2-5** [APP-077], **ES Figure 15-4** [APP-162] and the figures contained within the **Statement of Common Ground (SoCG) with National Highways** [REP1-086]. The difference between **ES Figure 2-5** [APP-077] and **ES Figure 15-4** [APP-162] has arisen because the figures were prepared for different purposes. **ES Figure 2-5** [APP-077] was intended to illustrate the access arrangements associated with the Scheme, whereas **ES Figure 15-4** [APP-162] was prepared to demonstrate the proposed AIL routing strategy during the construction phase. Upon review, the Applicant agrees that the inclusion of routing information within **ES Figure 2-5** [APP-077] is unnecessary and has the potential to create confusion regarding the intended purpose of the figure. Accordingly, an updated version of **ES Figure 2-5** (Doc Ref. 6.2 Rev 1) has been submitted at Deadline 3 with all HGV and AIL routeing information removed, such that the figure solely illustrates the Site access arrangements. In relation to **ES Figure 15-4** [APP-162], the Applicant has reviewed the routing strategy following discussions with National Highways and subsequent agreement of the routing plan presented within the **SoCG** [REP1-086]. To ensure consistency across the application documents, **ES Figure 15-4** (Doc Ref. 6.2 Rev 1) has been updated at Deadline 3 to accord with the most recent routing plan agreed with National Highways. In developing the AIL routing strategy, the Applicant considered alternative routes connecting the Site to the Strategic Road Network (SRN). Following further assessment and engagement with National Highways, the Applicant concluded that AIL movements should be routed via the A16 from both the north and south, providing the most appropriate and practical connection between the Site and the SRN. Consequently, the previously illustrated route which extended further east from the Order Limits via the A151 and A17 is no longer proposed and has been removed from the agreed AIL routing strategy. The updated **ES Figure 15-4** (Doc Ref. 6.2 Rev 1) reflects this position.

ExQ1	Question to:	Question:
		The figures included within the **SoCG with National Highways** [REP1-086] were provided to facilitate discussions regarding the proposed HGV and AIL routeing strategy and to record the routing arrangements agreed between the parties. The Applicant considers it appropriate for the figures within the SoCG to remain within the Examination, as they provide a record of the agreed routing strategy between the Applicant and National Highways. However, to avoid any ambiguity, the Applicant has updated **ES Figure 15-4** (Doc Ref. 6.2 Rev 1) to align with the agreed SoCG routing plan and removed routing information from **ES Figure 2-5** (Doc Ref. 6.2 Rev 1), thereby ensuring a consistent and clear presentation of the proposed HGV and AIL movements across the application documentation.
Q18.0.3	The applicant Lincolnshire County Council	**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.

ExQ1	Question to:	Question:
		• 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.
		<u>Construction work zones</u> As stated in the **Relevant Representations Report** [REP1-074], accesses HR-01 and HR-02 are intended to serve different sections of the Grid Connection Route (GCR) and are associated with separate construction work zones. An updated **ES Figure 15-7** (Doc Ref. 6.2 Rev 2) has been provided by the Applicant at Deadline 3. This figure clearly demonstrates the correlation between the GCR access points and the relevant traffic zones used within the assessment. In doing so, it identifies the sections of the GCR served by each access point and illustrates the relationship between the construction access strategy and the traffic distribution assumptions presented within **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1). To provide further clarity, the updated figure clearly identifies the construction work zones associated with accesses HR-01 and HR-02 and demonstrates how each access serves a distinct section of the GCR. This confirms that the access strategy has been developed to avoid interaction between construction traffic associated with separate work areas and remove the need for vehicle movements between access points. <u>Operation of HR-01 and HR-02</u> The Applicant has carefully considered the operation of both access points in the context of maintaining the safe and efficient operation of the A151.

ExQ1	Question to:	Question:
		Construction traffic management measures will be implemented through the Detailed Construction Traffic Management Plan (CTMP) in substantial accordance with the measures set out within the **OCTMP** [APP-278] to ensure that: • Construction traffic will be directed to the most appropriate access point based on the location of the works being undertaken, thereby avoiding/removing the need for vehicles to travel between work zones or undertake unnecessary turning manoeuvres on the A151, i.e. the construction traffic routeing will manage the use of HR-01 so that the required movements are left-in/right-out, and the use of HR-02 so that the required movements are right-in/left-out. • Driver briefing procedures, routing instructions and construction traffic management measures will be implemented to reinforce the intended access strategy and direct vehicles to the appropriate access for the relevant work area. • Traffic marshals will be deployed where necessary during periods of higher construction activity to assist with the safe ingress and egress of construction vehicles and to ensure compliance with the approved access strategy. • Temporary traffic management measures, including warning signage and, where required, traffic control measures, will be implemented in accordance with the approved CTMP to manage interactions between construction traffic and general traffic on the A151. The Applicant considers the above measures provide a robust series of management and control systems to ensure that accesses HR-01 and HR-02 operate as the **OCTMP** [APP-278] intended. Notwithstanding, the Applicant shall continue to engage with Lincolnshire County Council to determine whether any additional design alterations or management measures need be considered and included into subsequent updates to the **OCTMP** [APP-278]. <u>Measures to Prevent Construction Traffic Crossing Between HR-01 and HR-02</u>

ExQ1	Question to:	Question:
		The Applicant confirms that construction traffic is not intended to cross the A151 between HR-01 and HR-02. These access locations define the split between discrete work zones. The construction strategy has been developed on the basis that: • HR-01 and HR-02 will serve distinct construction work areas. • Vehicles accessing a particular work zone will enter and leave through the designated access serving that work zone. • In accordance with the Applicant's response above titled 'Operation of HR-01 and HR-02', the Applicant intends to implement a range of management and control measures to ensure these construction access points operate in accordance with the OCTMP [APP-278] Internal construction routes will be established, where required, to allow movements within individual work areas without reliance upon crossing the A151. In addition to the control measures listed above, the Applicant recognises Lincolnshire County Council's concerns that the above control measures do not eliminate the risk of construction vehicles seeking to directly cross the A151. Therefore, the Applicant will update the OCTMP [APP-278] at Deadline 4 to include a commitment to implement a staggered arrangement for the A151 access points at detailed design. <u>Bound Surfacing Length</u> The Applicant acknowledges the apparent discrepancy between the access drawings contained within Annex B of the OCTMP [APP-278, REP1-067] and the text of the OCTMP. The access drawings illustrate approximately 25 metres of bound surfacing extending from the edge of the public highway, whereas the OCTMP text refers to a minimum provision of 20 metres. The Applicant confirms that the commitment within the OCTMP is to provide a minimum length of bound surfacing of 20 metres from the carriageway edge to prevent the transfer of mud and debris

ExQ1	Question to:	Question:
		onto the public highway. The access drawings illustrate an indicative arrangement which exceeds this minimum requirement. Accordingly, no conflict is intended between these documents. The drawings show an example access layout providing approximately 25 metres of bound surfacing, while the OCTMP establishes the minimum design requirement of 20 metres. Where practicable and appropriate to the final access design, a greater length of bound surfacing may be provided. The Applicant will review the wording and associated figures for Deadline 4 and introduce any necessary amendments to ensure consistency and avoid ambiguity within the application documents.
Q18.0.4	The applicant	**Accesses** ES Figure 2-5: Construction, Operational and Decommissioning Accesses [APP-077] shows access QB-01 as 'construction, operation and decommissioning use' and QB-02 as 'operational use only'. Figure 1: Solar Development Area Land Parcel B5 Construction Compounds [REP1-098] within appendix A shows a construction access swathe from Queens Bank to the construction compounds and 400kV substation and BESS compound. However, use of these accesses is inconsistent with the following figures: • ES Figure 2-2: Indicative Solar Development Area and Inter-Array Connections Layout Plan (sheet 3 of 8) [APP-074] shows no maintenance access or new access track from either of these access points. • ES Figure 2-4: Indicative Grid Connection Route Layout Plan (sheet 9 of 9) [APP-076] shows access to the 400kV substation and BESS compound to be from the north via a maintenance access and access A16-01. This is also reflected in LCC-052 of the Relevant Representations Report [REP1-074] which states that "access A16-01 is required to facilitate access to the GCR to the north and the BESS infrastructure to the south. Once construction has been

ExQ1	Question to:	Question:
		completed, vehicle movements associated with the operational phase are anticipated to be significantly lower, reflecting the limited nature of the maintenance and inspection works required". • ES Figure 2-6: Solar Development Area and Inter-Array Connections Illustrative Construction Layout Plan (Sheet 3 of 8) [APP-078] shows no AIL road or new access track from QB-01 to the 400kV substation and BESS compound. Can the applicant confirm the purpose of accesses QB-01 and QB-02, what phases (construction/ operational/ decommissioning) they are intended to provide access to and please amend the above figures to reflect the intended access points and routes and that the use of these accesses align with OCTMP [APP-278] annex 2 sheets 13 and 14. Please also confirm that operational access to the 400kV substation and BESS compound would be provided by access A16-01. Furthermore, ES figure 2-7: Grid Connection Route Illustrative Construction Layout Plan (sheet 9 of 9) [APP-079] shows an existing road that heads southwards from the southwest corner of the 400kV substation and BESS compound, yet this is not shown on Figure 2-6 [APP-078]. Please explain this disparity.
		The Applicant notes the Examining Authority's request for clarification regarding the purpose of accesses QB-01 and QB-02 and the apparent inconsistencies between **ES Figures 2-2** [REP1-024], **2-4** [APP-076], **2-5** [APP-077], **2-6** [APP-078], **2-7** [APP-079] and Annex B of the **OCTMP** [APP-278]. Access QB-01 is proposed to serve the 400kV Substation and BESS Compound from the south during the construction, operational and decommissioning phases of the Scheme. In addition to providing routine access, the Applicant has designed the access strategy to provide two points of entry to the 400kV Substation and BESS Compound during all phases of the Scheme. This approach provides resilience and ensures suitable emergency access arrangements are

ExQ1	Question to:	Question:
		available, including access for the local fire and rescue service. Accordingly, access to the 400kV Substation and BESS Compound is available from both QB-01 and A16-01. Access QB-02 is proposed for operational use only. The access is intended to facilitate maintenance vehicles access to the solar infrastructure located within the northern part of Parcel B from Queen's Bank. The Applicant notes the Examining Authority's observation that **ES Figure 2-2: Indicative Solar Development Area and Inter-Array Connections Layout Plan** [REP1-024] does not show maintenance access tracks from QB-01 or QB-02. The Applicant confirms that Figure 2-2 identifies the routes associated with QB-01 and QB-02 through the existing access tracks, which are shown by the dashed grey line layer on the figure. Accordingly, dedicated new access tracks are not shown because the existing access network is intended to be utilised. The Applicant confirms that **ES Figure 2-4: Indicative Grid Connection Route Layout Plan** [APP-076] is correct in showing access to the 400kV Substation and BESS Compound from the north via A16-01. The Applicant's access strategy provides access from both A16-01 and QB-01, thereby maintaining two independent access routes to the 400kV Substation and BESS Compound throughout the construction, operational and decommissioning phases. The Applicant notes the Examining Authority's comments regarding **ES Figure 2-6: Solar Development Area and Inter-Array Connections Illustrative Construction Layout Plan** [APP-078]. The Applicant confirms that **ES Figure 2-6** (Doc Ref. 6.2 Rev 1) has been updated for Deadline 3 to include an illustrative construction access track that will be used by vehicles travelling from QB-01 to the 400kV Substation and BESS Compound during the construction phase. This provides consistency with the construction access arrangements shown elsewhere within the application documents.

ExQ1	Question to:	Question:
		The Applicant notes the Examining Authority's observation that **ES Figure 2-7: Grid Connection Route Illustrative Construction Layout Plan** [APP-079] identifies an existing road extending southwards from the south-west corner of the 400kV Substation and BESS Compound. The Applicant confirms that the "existing road" layer shown on ES Figure 2-7 corresponds to the access route proposed to be utilised from QB-01 during the operational phase to serve the 400kV Substation and BESS Compound. However, ES Figure 2-7 was prepared specifically to illustrate the construction phase arrangements associated with the Grid Connection Route. As the existing road forms part of the operational access strategy rather than construction-specific infrastructure, this layer has subsequently been removed from **ES Figure 2-7** (Doc Ref. 6.2 Rev 1) at Deadline 3 to ensure that the figure remains focused on construction-phase components. The Applicant confirms that operational access to the 400kV Substation and BESS Compound will be available from both A16-01 and QB-01. This arrangement provides operational flexibility and ensures that two access routes are available to support maintenance activities and emergency response requirements throughout the lifetime of the Scheme.
Q18.0.5	The applicant	**Accesses** Can the applicant please: • Confirm why ES Figures 2-2 [APP-074], 2-6 [APP-078] and 2-7 [APP-079] do not show the location of access points into the OL from the public highway (i.e. the numbering of them), the extent of the bell mouths and then the extent of the hardstanding required during the construction phase. • Confirm which accesses AILs would use. The key for ES Figure 2-5 [APP-077] does not differentiate between HGV access points and AIL access points.

ExQ1	Question to:	Question:
		• Confirm if the AIL route travels along the A151 for the GCR, as these are not listed within paragraph 6.2.10 of the OCTMP [APP-278]. • Confirm whether the symbols shown on ES Figure 2-5 [APP-077] is for HGV access alone or for other vehicles. If it is the latter, why are other accesses such as at Swindlers Drove not identified on this figure? Please provide a figure that shows all access points by vehicles associated with the development proposal into the OL from the public highway. • Clarify within parcel A, where the access track from Spalding Road into parcel A would be located as the internal access track appears to cease at the substation.
		The Applicant acknowledges the requests from the Examining Authority concerning the site accesses and has addressed them point by point below. <u>Location of access points from the public highway</u> The accesses into the Order Limits from the public highway are shown in **ES Figure 2-5: Construction, Operational and Decommissioning Access** (Doc Ref. 6.2 Rev 1). The access numbering shown on this figure corresponds with the accesses secured through the **Streets, Rights of Way and Access Plans** [APP-014 & AS-009]. The Applicant notes that the purpose of **ES Figures 2-2, 2-6** and **2-7** (Doc Ref. 6.2 Rev 1) is to illustrate the indicative layout and construction arrangements associated with the Scheme. These figures are not intended to provide detailed access design information. The indicative access designs, including bell mouths, hardstanding extents and access geometry, are provided within Annex B of the **OCTMP** [APP-278 and REP1-067]. The Applicant does not consider it appropriate to reproduce this level of detail on the Environmental Statement figures as, at the scale at which those figures are presented, the intricate access design information would not be readily perceptible and would potentially obscure the primary purpose of the figures. AIL accesses

ExQ1	Question to:	Question:
		The accesses capable of accommodating Abnormal Indivisible Loads (AILs) are identified within Annex A of the **OCTMP** [APP-278], which sets out the access requirements for each access point. The Applicant also notes that **ES Figure 15-4: Abnormal Indivisible Load Routing** (Doc Ref. 6.2 Rev 1) is the dedicated figure illustrating the AIL routing strategy and should be read in conjunction with Annex A of the **OCTMP** [APP-278]. Annex A of the **OCTMP** [APP-278] confirms which accesses would be able to accommodate AIL movements from the public highway, including HR-01, HR-02 and HR-03 from the A151. <u>A151 Route</u> The Applicant confirms that the A151 forms part of the proposed AIL routeing strategy for the Grid Connection Route and this is identified on **ES Figure 15-4: Abnormal Indivisible Load Routing** (Doc Ref. 6.2 Rev 1) The Applicant notes that paragraph 6.2.10 of the **OCTMP** [APP-278] identifies those accesses which were subject to preliminary AIL routing assessment and does not seek to provide a comprehensive list of all roads forming part of the AIL route. However, the Applicant has updated **ES Figure 15-4** (Doc Ref. 6.2 Rev 1) for Deadline 3 to exclude the AIL routing further east past HR-03, to align with the routeing discussed with National Highways. <u>Symbology on ES Figure 2-5 and access points by vehicle type</u> The symbols shown on **ES Figure 2-5: Construction, Operational and Decommissioning Access** (Doc Ref. 6.2 Rev 1) identify new and upgraded existing accesses that are required to support the construction, operation or decommissioning phases of the Scheme. The figure was prepared to show the access strategy across the phases of the Scheme and does not differentiate between

ExQ1	Question to:	Question:
		accesses required for HGVs, AILs or other vehicle types. The detailed vehicle requirements associated with each access are instead provided within Annex A of the **OCTMP** [APP-278]. The Applicant also notes that **ES Figure 2-5** (Doc Ref. 6.2 Rev 1) is intended to identify access locations and their phase-specific use. It is not intended to define the HGV or AIL routing strategy, which is shown on the dedicated routing figures, namely **ES Figure 15-3: HGV Routing** [APP-161] and **ES Figure 15-4: Abnormal Indivisible Load Routing** (Doc Ref. 6.2 Rev 1). The Order Limit boundary adjoining Swindler's Drove has been included to provide rights of access for occasional maintenance vehicles required to service the Grid Connection Route intermittently during the operational phase. The Applicant is not proposing to construct new accesses, undertake highway works or modify existing crossings at these locations. Access would be obtained through existing access points from the local highway and existing farm tracks along field boundaries. These maintenance access routes are shown on **ES Figure 2-4 Indicative Grid Connection Route Layout Plan** [APP-076]. Existing third-party access routes, where no works are proposed, are also shown on **ES Figure 2-7 Grid Connection Route Illustrative Construction Layout Plan** (Doc Ref. 6.2 Rev 1). Where right of access only has been included within the Application, with no works to the access proposed, these accesses are not shown on **ES Figure 2-5** (Doc Ref. 6.2 Rev 1). These only relate to operational maintenance and third party access routes. <u>Parcel A access track from Spalding Road</u> The Applicant confirms that the access track from Spalding Road into Land Parcel A would be located within the Indicative Underground Cable Working Corridor shown on **ES Figure 2-6: Solar Development Area and Inter-Array Connections Illustrative Construction Layout Plan** (Doc Ref. 6.2 Rev 1). Further arrangement of this working corridor would be subject to detailed design. The indicative access arrangement from Spalding Road is shown within Annex B of the **OCTMP** [APP-

ExQ1	Question to:	Question:
		278]. **ES Figure 2-6** (Doc Ref. 6.2 Rev 1) has been updated for Deadline 3 to include an indicative alignment of the access road, which had been missed by error.
Q18.0.6	The applicant	**Accesses** Please provide a figure identifying each access point and the estimated worst-case vehicle movements anticipated at each, including separate figures for staff vehicles, HGVs, large goods vehicles (LGV) and other vehicle categories.
		The location of each access point is provided within **ES Figure 2-5** (Doc Ref. 6.2 Rev 1), **ES Figure 15-3** [APP-161], **ES Figure 15-4** (Doc Ref. 6.2 Rev 1), and Annex B of the **OCTMP** [APP-278 and REP1-067], which includes indicative drawings and access arrangements for each proposed access location. Annex A of the **OCTMP** [APP-278] sets out the forecast peak hourly and daily two-way vehicle movements anticipated at each access point. The Applicant therefore considers that Annexes A and B can be read together to provide the information sought by the Examining Authority, namely: • the location of each access point; • the form and design of each access; • the anticipated peak hourly vehicle movements; and • the anticipated peak daily vehicle movements associated with each access. It is noted that Annex A does not include a breakdown for staff vehicles, HGVs, LGVs and other vehicle categories by access. Instead, it sets out of the maximum vehicle movements which have been assessed. Breakdown of different vehicle types will vary through the construction period and, as such, it is the total maximum number of vehicles rather than a breakdown that has been used to inform the assessment.

ExQ1	Question to:	Question:
		The Applicant thus does not consider that the preparation of a new figure is necessary, as it is the maximum number of vehicles that requires assessment and this information is already contained within the submitted DCO Application documents.
Q18.0.7	The applicant	**Abnormal indivisible load accesses** Please clarify why accesses SG-01 and RW-01 (as detailed within the OCTMP [APP-278] annex A – Access Design Information Table) would require AIL access given no AIL or HGV routing is shown to these accesses on ES figure 2-5 [APP-077].
		As per the Applicant's response to Q.18.0.2, AIL and HGV routing has been removed from **ES Figure 2-5** (Doc Ref. 6.2 Rev 1) and is instead only shown on **ES Figures 15-3** [APP-161] **and 15-4** (Doc Ref. 6.2 Rev 1). For clarity, the Applicant proposes that these figures will become the principal figures showing the agreed HGV and AIL routing strategy. The Applicant notes the Examining Authority's request for clarification regarding accesses SG-01 and RW-01 and the relationship between the access requirements identified within Annex A of the **OCTMP** [APP-278] and the routing information presented on **ES Figures 15-3** [APP-161] and **15-4** (Doc Ref. 6.2 Rev 1). As shown on Figures 15-3 and 15-4, HGV and AIL vehicles travelling from the Strategic Road Network would access the GCR via access HR-03 from the A151. From HR-03, vehicles would travel westwards along the existing private road serving the GCR corridor to access RW-01. Consequently, RW-01 does not require a separate AIL route from the public highway and is not intended to operate as an independent point of access for AIL movements directly from the highway network. The identification of RW-01 within Annex A of the **OCTMP** [APP-278] as requiring AIL-capable geometry reflects the need for abnormal loads to pass through and operate within that part of the construction corridor once they have entered the site via HR-03. Similarly, whilst SG-01 may need

ExQ1	Question to:	Question:
		to accommodate abnormal load movements within the construction area, these movements would be limited to crossing manoeuvres associated with the construction works and would not constitute direct AIL access to or from the public highway. Therefore, no inconsistency is intended between **ES Figures 15-3** [APP-161] and **15-4** (Doc Ref. 6.2 Rev 1) and the OCTMP [APP-278]. These figures identify the strategic HGV and AIL routing arrangements and the primary interface with the public highway network, whilst Annex A of the OCTMP sets out the design requirements of individual accesses to ensure they can safely accommodate the range of vehicles required during construction. To avoid any ambiguity, the Applicant will review and update the wording of Annex A of the **OCTMP** [APP-278] for Deadline 4 to clearly distinguish between: • access points used for direct HGV and AIL access from the public highway network; and • access points that are required to accommodate HGV and AIL movements within the construction corridor following entry via HR-03.
Q18.0.8	The applicant	**Access point QB-01** Paragraph 6.2.10 of the OCTMP [APP-278] states that a preliminary assessment of AIL movements was undertaken reviewing routing from A16 to the accesses to test the viability of the routing. Please clarify why access QB-01 is not included in this paragraph.
		The Applicant notes the Examining Authority's request for clarification regarding the omission of access QB-01 from paragraph 6.2.10 of the **OCTMP** [APP-278]. The purpose of paragraph 6.2.10 of the **OCTMP** [APP-278] is to demonstrate that a preliminary assessment of the local road network has been undertaken for abnormal indivisible load (AIL) vehicles that are required to travel along the public highway network in order to access key construction access locations associated with the Scheme.

ExQ1	Question to:	Question:
		Access points A16-01, BB-01, MR-02 and LGR-05 are specifically referenced within paragraph 6.2.10 as these locations may be accessed directly by AIL vehicles from the local road network and therefore required route viability testing to confirm that abnormal loads could safely reach the relevant access points. In contrast, access QB-01 was not included within the assessment referenced in paragraph 6.2.10 because AIL vehicles are not anticipated to access this location directly from the public highway network. During the construction phase, AIL movements in the vicinity of QB-01 would be limited to a crossing manoeuvre of Queens Bank rather than travelling along the local highway network to access the site at this location. This manoeuvre is illustrated within Annex B of the **OCTMP** [APP-278], Sheet 13 of 45, which shows the proposed construction access arrangement at Queens Bank. As QB-01 does not require AIL vehicles to be routed to the access via the local road network, it was not necessary to include QB-01 within the preliminary route assessment described in paragraph 6.2.10. The Applicant therefore considers that the omission of QB-01 from paragraph 6.2.10 is appropriate and reflects the differing operational requirements of this access when compared with A16-01, BB-01, MR-02 and LGR-05, all of which may receive AIL vehicles directly from the highway network.
Q18.0.9	The applicant	**Access point A16-01** Please clarify, based on the OCTMP [APP-278] annex 2, sheet 12, whether for the AIL to gain access into this access point, it would have to move into the outside lane to complete the manoeuvre. The ExA notes that this drawing also says 'removal of existing earth bund to facilitate construction of access'. Please clarify whether this bund currently serves a purpose and if it were to be removed, what consequence that may have.

ExQ1	Question to:	Question:
		As part of the **OCTMP** [APP-278], the Applicant has prepared access drawings for each access location which are contained within Annex B. Access A16-01 (Sheet 12 of 45) presents the engineering details associated with operation of this access. As shown on the drawing, abnormal load manoeuvres are anticipated to require a vehicle up to 58m to deliver the transformer equipment, and insets A and B provide Swept Path Analysis to demonstrate the access and egress manoeuvres for this design vehicle. The Applicant acknowledges that, due to the size and turning characteristics of this abnormal load vehicle, the vehicle will need to occupy both lanes of the carriageway during the turning manoeuvre. The Applicant has considered this and in paragraph 5.6.3 of the **OCTMP** [APP-278] outlines that "*a specialised haulage service will be employed to allow these components to be transported with the necessary escort, permits and traffic management, with the Applicant consulting the relevant highways authorities to ensure the correct permits are obtained. The police will also be given advanced notification under the Road Vehicle Authorisation of Special Types Order 2003*". Accordingly, any AIL movement utilising A16-01 would be undertaken under controlled conditions, including appropriate escort vehicles, traffic management measures and the necessary approvals from the relevant highway authorities, thereby ensuring the manoeuvre can be undertaken safely. In relation to the existing earth bund, the Applicant confirms that the bund is a raised, planted landscape feature that currently provides visual screening from the A16. A section of the bund would require removal to facilitate construction of the proposed access and ensure suitable access geometry and visibility can be achieved. The Applicant does not consider that removal of this section of bund would give rise to any material adverse effects. The bund's primary function is landscape screening. Furthermore, the nearest residential receptors to the east are approximately 2km away on Woodgate Road. As a result, the

ExQ1	Question to:	Question:
		partial removal of the bund is not anticipated to materially affect visual amenity or other receptors in the surrounding area.
Q18.0.10	The applicant	**Access point BB-01** The OCTMP [APP-278] annex 2, sheet 15 inset B says that for axle trailer vehicles heading west, they would turn right onto Barrier Bank. Whereas inset D says articulated vehicles turning east would turn left on to Barrier Bank. However, this appears to be the same manoeuvre as inset B. Please clarify. Furthermore, please explain the purpose of access point BB-01 given no new access track is identified on sheet 2 of 8 of figure 2-6 [APP-078] at this access point and ES figure 2-2 [APP-074] does not show any access point from Spalding Road at the point of BB-01.
		The Applicant notes the matter raised by the Examining Authority with regard to Sheet 15 and acknowledges that the descriptions associated with the manoeuvres shown on Sheet 15 of Annex B of the **OCTMP**[APP-278] could lead to ambiguity. The Applicant will update Sheet 15 at Deadline 4 to correct the descriptions and ensure that the direction of travel and corresponding vehicle manoeuvres are accurately represented. **ES Figures 2-2** (Doc Ref. 6.2 Rev 2) **and 2-6** (Doc Ref. 6.2 Rev 1) have been updated for Deadline 3 to include the new access track from BB-01 into Parcel A, which had been missed by error.
Q18.0.11	The applicant	**Access points MR-01 and MR03** Please clarify based on the OCTMP [APP-278] annex 2, sheet 18: • Why both these accesses need to remain during the operational phase. Would one access point not be sufficient? • Why access for AILs is required for access point MR-01?

ExQ1	Question to:	Question:
		• For insets D and F, why articulated vehicles would be travelling inbound to MR-01 from the north and exiting MR-01 to travel northbound given there is no HGV routing north of MR-01?
		The Applicant has developed a construction strategy that identifies access MR-01, as presented on Sheet 18 of Annex B of the **OCTMP** [APP-278], as the sole construction access from Martins Road for Land Parcel C. This strategy was developed to minimise the number of construction turning movements taking place directly opposite residential properties located to the north of MR-01 on Martins Road. It is noted that at the PEIR stage, a significant construction traffic noise effect was identified for residential receptors at Martin's Farm. As such, this strategy has been specifically adopted, in order to avoid a significant construction traffic noise effect on these receptors, as construction vehicles would turn into Land Parcel C prior to travelling past Martin's Farm. In the operational phase, the Applicant proposes to retain MR-01 and to introduce additional access MR-03 as a secondary access into Land Parcel C. MR-03 is an existing field access from Martin's Road which would be upgraded for operational use. MR-01 would be used to facilitate infrequent heavy goods vehicle deliveries, such as replacement panels throughout the development lifetime, with all other operational access needs provided by MR-03. Retaining both accesses provides operational flexibility and resilience throughout the lifetime of the Scheme. It should also be noted that MR-01 will need to be utilised during the decommissioning phase. The Applicant confirms that AIL capability has been incorporated into the design of MR-01 because it serves as the principal construction access to Land Parcel C and may be required to accommodate abnormal indivisible loads associated with the construction phase (e.g. cable drums). The swept path assessment demonstrates that MR-01 can accommodate the largest vehicles reasonably anticipated during construction, including AILs where required. Inclusion of AIL swept path analysis does not indicate that regular AIL movements are anticipated during the operational phase but rather demonstrates that the access geometry is suitable for the full range of construction

ExQ1	Question to:	Question:
		vehicles that may require access. Insets D and F have been included to demonstrate that articulated vehicles can safely undertake turning manoeuvres associated with construction traffic movements between Land Parcels B and C via MR-01 and MR-02. The Applicant does not anticipate construction vehicles continuing north beyond MR-02, as reflected in **ES Figure 15-3** [APP-161]. Accordingly, the manoeuvres shown in Insets D and F should not be interpreted as representing the proposed HGV routing strategy. Rather, they have been included for swept path assessment purposes to demonstrate that the access geometry can safely accommodate articulated vehicles approaching from either direction and provide confidence in the operational capability of the proposed access arrangement.
Q18.0.12	The applicant	**Access points DB-03 and DB-04** Sheets 41 and 42 of OCTMP [APP-278] annex 2 show these accesses as operational accesses. The insets show that the access is suitable for a large mobile crane vehicle turning onto Delgate Bank turning either left or right and the vehicle turning off Delgate Bank to the accesses. Please explain why a large mobile crane would be required during the operational phase and why this routing of a large mobile crane, either as a HGV or AIL, is not shown on ES figures 2-5 [APP-077], 15-3 [APP-161] or 15-4 [APP-162].
		As per the Applicant's response to Q.18.0.2, AIL and HGV routing has been removed from **ES Figure 2-5** (Doc Ref. 6.2 Rev 1) and will instead be shown only on **Figures 15-3** [APP-161] **and 15-4** (Doc Ref. 6.2 Rev 1). The remainder of this response therefore refers only to Figures 15-3 and 15-4. The Applicant confirms that a mobile crane vehicle (12.3m in length) was adopted as the design vehicle for the swept path assessments of operational accesses DB-03 and DB-04. This approach was undertaken to provide flexibility within the Order Limits at this stage of the Scheme, prior to the completion of intrusive ground investigations and detailed design of the proposed Cable Sealing

ExQ1	Question to:	Question:
		End Compounds (CSECs). The swept path assessments therefore demonstrate that the accesses can accommodate a vehicle larger than that typically anticipated during the operational phase. The Applicant notes that the vehicles ordinarily required for the operation and maintenance of the CSECs would comprise light vehicles such as 4x4 maintenance vehicles, together with occasional specialist maintenance vehicles, including Mobile Elevated Working Platforms (MEWPs). Provision has also been made to accommodate a fire service vehicle (DB32 Fire Appliance, 8.68m in length) to ensure suitable emergency access can be achieved throughout the operational life of the Scheme. Whilst the requirement for a mobile crane during operation is considered unlikely, the Applicant has nevertheless assessed this vehicle to ensure that suitable access is available should it be required for exceptional maintenance activities. Such activities could include maintenance, repair or replacement works associated with the gantries or other major electrical infrastructure located within the CSECs. The inclusion of the mobile crane within the swept path assessment therefore represents a robust design approach rather than an indication of expected routine operational traffic. Given the infrequent and exceptional nature of such movements, the Applicant did not consider it necessary to identify mobile crane routes on **ES Figures 15-3** [APP-161] **or 15-4** (Doc Ref. 6.2 Rev 1). These figures were prepared to illustrate the anticipated construction HGV and AIL routing strategy and the principal traffic movements assessed within the Transport Assessment. They do not seek to identify occasional maintenance-related vehicle movements that may arise during the operational phase of the Scheme. Accordingly, the Applicant considers there is no inconsistency between the OCTMP [APP-278] and the Environmental Statement figures. The swept path assessments for DB-03 and DB-04 demonstrate that the operational accesses are capable of accommodating the largest reasonably foreseeable maintenance vehicle, whereas **ES Figures 15-3 [APP-161] and 15-4** (Doc Ref. 6.2 Rev 1) present the access purposes, construction HGV traffic and AIL routing strategies relevant to the assessment of transport effects.

ExQ1	Question to:	Question:
		For the avoidance of doubt, the Applicant confirms that the use of a mobile crane during operation would be an exceptional maintenance activity and is not anticipated to form part of routine operational traffic associated with the Scheme.
Q18.0.13	The applicant	**Internal access road** Please signpost to where within the documentation the detail of what the surfacing of the internal access roads that would be constructed during the construction phase and retained during the operational phase, would be constructed from beyond the 20m distance from the junction with the public highway.
		The Applicant has not provided within the Application documents a standard construction detail for the surfacing of internal access roads during either the construction or operational phases of the Scheme. The final specification of these access routes will be determined through the detailed design process and will be informed by factors including ground conditions, drainage requirements, construction methodology and operational access requirements, as noted in Requirement 5 of the **Draft DCO** (Doc Ref. 3.1 Rev 3). Accordingly, there is no specific document within the Application that prescribes a uniform surfacing specification for internal access roads beyond the highway interface. Notwithstanding this, the Applicant has committed within the **OCTMP** [APP-278] to provide a minimum of 20m of bound surfacing from the edge of the Local Highway Network at construction access locations. This approach is consistent with that adopted on similar DCO solar park developments and is intended to minimise the tracking of mud, debris and loose material onto the Local Highway Network by construction and operational vehicles. Beyond this minimum 20m bound-surfaced section, the detailed design of the internal access roads remains to be determined. The surfacing treatment will be developed as part of the detailed design

ExQ1	Question to:	Question:
		process, taking account of the intended function of the route and whether it is required on a temporary basis during construction or retained as an operational access track. The Applicant therefore confirms that the Application documents establish the requirement for a minimum 20m bound-surfaced section at the interface with the public highway but do not define a standard surfacing specification for the remainder of the internal access road network, as this will be subject to detailed design following consent.
Q18.0.14	The applicant	**Inter-Array accesses** Please provide clarification on the need for the number of accesses for the overhead inter-array (CH-01/ CH-02 and CS-01) and explain why the corridor either side of the inter-array could not be used as an alternative.
		At the early stages of developing the access strategy, the Applicant considered a haul route through the Overhead Inter-Array Connection. However, this was ruled out, as access may also be required during the operation of the Scheme for maintenance purposes. A haul route would also require the construction of multiple new watercourse crossings to cross field boundaries. Furthermore, access for constructing the Overhead Inter-Array Corridor would only be required for a short period of time and accommodate up to 13 vehicles per day at peak. As such, a haul route through the entirety of the Overhead Inter-Array Corridor was not considered appropriate or proportionate. Access locations CH-01 and CH-02 are required to facilitate the construction of the inter-array connection. CH-01 will allow access to the land parcel to the west of Chapel Hill, whereas CH-02 will permit access for construction vehicles to navigate eastwards on the inter-array corridor. The Applicant notes the Examining Authority's reference to CS-01, however the Applicant understands this to be a reference instead to GB-01. Swept Path Analysis conducted by the Applicant during design development identified a risk of construction vehicle movements navigating

ExQ1	Question to:	Question:
		between GB-01 and CH-01, not maintaining lane discipline during turning manoeuvres from Eaugate Road to Chapel Hill. To mitigate the above turning movement constraint, the Applicant considered an access into the land to the north of Eaugate Road to function as a crossing point in conjunction with GB-01. However, it was determined a perpendicular crossing with access GB-01 would be sited in too close a proximity to the junction of Eaugate Road and Chapel Hill. Shifting this crossing point westwards would have also risked construction vehicles navigating in close proximity to existing statutory undertaker overhead assets. Therefore, the Applicant considered that access to GB-01, CH-01 and CH-02 via the Local Road Network was the optimal approach for construction.
Q18.0.15	Peterborough City Council	**Construction traffic** Please comment on the applicant's response within the Relevant Representations Report [REP1-074] on the following: • Page 189 regarding Peterborough City Council's (PCC) request for the traffic survey area to include the A47/A16 junction. • Page 189 regarding PCC's request that Peterborough growth factors are applied for the Peterborough sections of the A16. • Page 194 regarding PCC's request for clarification with regard to the expected 15 two-way vehicular flows at the A16 / B1443 Thorney Road roundabout (Junction 16) triggering the need for a junction capacity assessment in accordance with the Peterborough Highway Services Transport Assessment Guidelines.
Q18.0.16	The applicant	**Construction traffic** Paragraph 15.4.52 of ES Chapter 15: Traffic and Transport [APP-066] states a gravity model was used to calculate the trip distribution of private staff vehicles and LGVs including crew buses

ExQ1	Question to:	Question:
		transporting tools and welfare vanes. Please include LGVs into tables 15-13 and 15-14. Please confirm how those movements for transporting tools and amenities are included in the assessment as they are not shuttle bus or car transport figures.
		The Applicant notes the Examining Authority's request for clarification regarding the treatment of LGV movements within the construction traffic assessment and their relationship to Tables 15-13 and 15-14 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1). Tables 15-13 and 15-14 present the forecast daily peak staff movements associated with the construction phase and are intended to illustrate the modal split between construction personnel travelling by private car and those travelling by shuttle bus. The purpose of these tables is therefore to quantify workforce travel demand only. LGV movements do not form part of the staff travel calculations and, accordingly, are not included within Tables 15-13 and 15-14. The Applicant therefore does not consider it appropriate to include LGV trips within these tables, as they represent a separate category of construction traffic and are not associated with the workforce modal split assumptions presented. As stated in paragraph 15.5.16 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1), a peak of 75 LGVs per day (equivalent to 150 two-way movements) is forecast to travel to and from the Grid Connection Route (GCR) during the construction phase. No LGV trips are forecast in relation to the Solar Development Area (SDA). The Applicant confirms that these LGV movements were separately accounted for within the construction traffic assessment and assigned to the highway network as part of the overall construction traffic forecasting exercise. The LGV category includes vehicles associated with the transport of tools, equipment, consumables, welfare facilities and other construction support activities referenced in paragraph 15.4.52.

ExQ1	Question to:	Question:
		Accordingly, whilst LGV movements are not shown within Tables 15-13 and 15-14, they have been included within the construction traffic assessment and the resulting traffic impact analysis reported in ES Chapter 15. The Applicant therefore considers that the assessment appropriately accounts for both workforce travel demand and LGV construction support movements, with each reported within the relevant sections of the Environmental Statement.
Q18.0.17	The applicant	**Construction traffic** Paragraph 15.5.18 of ES Chapter 15: Traffic and Transport [APP-066] states that whilst the proposed development is located close to several villages/ small settlements, no trips are expected to originate from or pass through these villages during the construction, operation or decommissioning phase. Please clarify how this paragraph aligns with ES figure 2-5 [APP-077] which shows HGV and AIL routing through the settlement of Holbeach Drove and the southern end of Whaplode Drove, alongside any workers who are residing in the vicinity and where the shuttle bus maybe collecting from.
		The Applicant acknowledges that the text in paragraph 15.5.18 is potentially misleading and that some trips will pass adjacent to the settlements of Holbeach Drove and Whaplode Drove. This paragraph in the ES was intended to refer to Cowbit and Crowland since vehicle trips associated with the construction of the Scheme will not pass through these settlements. The Applicant has updated the wording of this paragraph in **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1) at Deadline 3 to be clearer.
Q18.0.18	The applicant	**Construction traffic** In respect of table 15 -16 of ES Chapter 15: Traffic and Transport [APP-066], please confirm which junctions or roads this table is referring to and clarify why the GCR is not included in this table.
		The Applicant can confirm that the junction and road receptors referred to in Table 15-16 are those associated with the respective parts of the Scheme identified within the 'Solar Development Area

ExQ1	Question to:	Question:
		and Inter-Array Connections' column. These receptors are shown on **ES Figure 15-1: Traffic and Access Study Area** (Doc Ref. 6.2 Rev 1). The Trip Distribution Scenarios presented in Table 15-16 were developed to consolidate construction traffic movements to different parts of the Solar Development Area and Inter-Array Connection to efficiently assess the worst-case traffic impacts at the relevant highway receptors. For example, separate land parcels which would utilise the same assessed receptors (same routing, i.e. to Land Parcels B and C) have been grouped into a single Trip Distribution Scenario to avoid unnecessary duplication whilst ensuring that the worst-case traffic impacts were captured. The GCR has been excluded from this process since the vehicle movements to each GCR 'Zone' have been assessed independently and subsequently combined with the worst-case impacts from each of the four Trip Development Scenarios to derive the overall worst-case peak trip numbers shown in Table 15-21 (and in more detail in **ES Appendix 15-3: Receptor Traffic Flow Tables [APP-250]**). It was therefore unnecessary and potentially duplicative to create additional Trip Distribution Scenarios for the GCR. The Applicant would emphasise that the omission of the GCR from Table 15-16 does not indicate that GCR construction traffic has been excluded from the assessment. Rather, GCR traffic is fully incorporated within the overall construction traffic forecasts for each link and junction receptor included within the traffic assessment found in **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1).
Q18.0.19	The applicant	**Construction traffic** Please confirm whether the crossing point accesses (as shown as a green triangle on ES figure 2-5 [APP-077]) would be used for access from/ egress to the public highway by construction staff cars/ LGVs.

ExQ1	Question to:	Question:
		The Applicant can confirm that the locations denoted as green triangles on **ES Figure 2-5** (Doc Ref. 6.2 Rev 1) are intended to operate as crossing points only and are not proposed to function as temporary construction access points accommodating general construction traffic movements. These crossing points may be utilised by construction vehicles and LGVs where required to facilitate access between work areas located on either side of the crossed highway, but construction traffic would not access the Site from the local highway network using these crossing points. That is, they are not intended to operate as dedicated points of access from, or egress to, the public highway network in the same manner as the construction access locations identified within the **OCTMP** [APP-278].
Q18.0.20	The applicant	**Construction traffic** Paragraph 5.4.3 and table 5-1 of the OCTMP [APP-278]. Please confirm: • Whether HGV deliveries include AILs. • Whether the numbers provided in table 5-1 are one-way trips or two-way movements. • Why would there be no LGV deliveries for the SDA or inter-array connection area when they would be used to transport tools to/ from the site?
		<u>AIL Movements</u> The Applicant confirms that the HGV delivery figures presented in Table 5-1 of the OCTMP [APP-278].do not include AIL movements. AIL deliveries are exceptional events and will not occur on a regular schedule in the same manner as standard HGV deliveries. As such, they have been considered separately from the daily construction traffic forecasts and are not included within the HGV delivery totals presented in Table 5-1. This is typical for solar DCOs. <u>Trip Definitions</u>

ExQ1	Question to:	Question:
		The Applicant confirms that the HGV and LGV delivery figures presented within Table 5-1 represent number of vehicles, rather than two-way vehicle movements (arrivals/ departures). Consequently, each delivery vehicle would typically generate a corresponding return movement which is not included within the values presented in Table 5-1, but is accounted for within the Assessment of Potential Impacts and Likely Significant Effects presented in section 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1). LGV Deliveries to the SDA Whilst LGVs may be used on occasion to transport personnel, tools and other minor equipment to these areas, no specific LGV delivery demand was forecast as part of the construction assessment for the SDA. Rather, for the purposes of undertaking a worst case assessment, all deliveries have been assumed to be HGVs. Any limited LGV movements associated with the SDA would not materially alter the construction traffic assessment or the conclusions of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1).
Q18.0.21	Lincolnshire County Council	**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.
Q18.0.22	The applicant	**Underground Inter-Array Connection access**

ExQ1	Question to:	Question:
		Please confirm how construction access would be obtained to the underground inter-array connection area between the 132kV substation in parcel A to parcel B for open-cut trenches.
		The Applicant confirms that access to the inter-array connection works would be obtained via the approved construction access network serving Land Parcels A and B, including access arrangements from Spalding Road and access BB-01, as identified within the **OCTMP** [APP-278]. Details of the relevant construction access arrangements are provided within Annex B of the OCTMP. **ES Figures 2-2** (Doc Ref. 6.2 Rev 2) **and 2-6** (Doc Ref. 6.2 Rev 1) have been updated for Deadline 3 to include the new access track from BB-01 into Parcel A, which had been omitted from the figures by error. This would also provide access for the open cut trenching for cabling between Parcels A and B. To clarify, the crossing of the A16 associated with the Inter-Array Connection would be undertaken using trenchless crossing techniques, such as Horizontal Directional Drilling (HDD), thereby avoiding the need for open-cut trenching beneath the A16.
Q18.0.23	The applicant	**Passing places** The Relevant Representations Report [REP1-074], in response to LCC-053, recognises the need for temporary passing places on Martins Road, Langary Gate Road, Back Bank and Holbeach Drove Gate. Can the applicant explain why passing places would not be required for Spalding Road given it is identified as a route for HGVs and AILs on Figure 2-5: Construction, Operational and Decommissioning Accesses [APP-077].
		The Applicant proposes that Spalding Road will be utilised by construction vehicles accessing Parcel A to minimise disruption to the residents of Crowland. Spalding Road currently operates as a two-way carriageway with a centre line. The Applicant therefore considers that the existing carriageway width and horizontal alignment are sufficient to accommodate two-way movements of typical construction vehicles, including HGVs without the

ExQ1	Question to:	Question:
		need for temporary passing places. Where AIL deliveries are required, these will be undertaken under escort following the approval by the Local Highways Authority. Based upon these considerations, the Applicant does not believe passing places are required. The Applicant continues to engage with Lincolnshire County Council (LCC) with regards to any temporary passing place requirements and notes that Spalding Road has not been identified by LCC as a carriageway for assessment. Based on the existing characteristics of the route, the anticipated construction traffic flows and the managed nature of AIL movements, the Applicant does not consider temporary passing places on Spalding Road to be necessary.
Q18.0.24	The applicant	**Passing places** Please provide an update on the development of the Temporary Passing Place Strategy document and when it is anticipated to be submitted into the examination.
		The Applicant has met with Lincolnshire County Council's Highways Officers and is in the final stages of completing the passing place proposals for Back Bank, Martin's Road and Langary Gate Road for review. The Applicant can confirm that passing places are no longer under consideration for Holbeach Drove Gate following consultation with Lincolnshire County Council due to the carriageway width being sufficient to accommodate two-way movements. Subject to Lincolnshire County Council's review of the passing places proposals, the Applicant anticipates that these proposals will be submitted into the examination at Deadline 4. The Applicant will continue to engage with Lincolnshire County Council on this matter and will provide an updated programme should there be any change to the anticipated submission date.

ExQ1	Question to:	Question:
Q18.0.25	The applicant	**Operational traffic** ES Chapter 15: Traffic and Transport [APP-066] and the Transport Assessment Note [APP-251] state that the operational phase is expected to attract low levels of vehicle trips, circa 22 two-way movements per day, in the form of four-wheel drive vehicles and vans with HGVs rarely accessing the site during this phase. These documents say that the operational phase would have up to 10 permanent staff per day and around five visitors per week. The Written Summary of Oral Submissions at ISH1 [REP1-098] page 38 states "an allowance for water tanker movements has been included within the traffic assessment presented in the Environmental Statement" and that a similar approach has been taken on other consented DCO projects in Lincolnshire. Given paragraph 2.3.1 of the OOEMP [REP1-063] says that "the scheme will require 90 litres of water per person per day for up to 10 employees" alongside water being supplied for more extensive operational activities and the removal of foul/ wastewater collected in portable welfare units, the ExA requests details of: • How many two-way vehicle movements would be generated per day from the importation of clean water for the scheme during the operational phase. • How many two-way vehicle movements would be generated per day from the exportation of wastewater for the scheme during the operation phase. • What type of vehicle(s) would import clean water and export wastewater and what accesses they would be envisaged to utilise during the operational phase. • Please sign post to where this information has been taken account of within the traffic assessment within the ES.
		<u>Operational Water Supply</u>

ExQ1	Question to:	Question:
		As set out within the **Water Supply Strategy** [REP2-019], the operational phase of the Scheme is anticipated to require the following water supply: • 0.55m^3 per day for welfare facilities at On-Site Substation Compounds (note the estimate was updated within the **Water Supply Strategy** [REP2-019] since the preparation of the ES); • Annual panel cleaning which would require approximately 3,386 m^3 of water once per year across the Solar Development Area. This activity would be phased across the year and would result in a typical daily rate of approximately 9.3m^3. • One-off supply of firefighting water for BESS Compound water tanks, which would require 360m^3 of water. As set out within **ES Chapter 2: The Scheme** (Doc Ref. 6.1 Rev 2) and **ES Chapter 11: Hydrology and Flood Risk** [REP1-020], the On-Site Substation Compounds would connect into the mains supply, however, the provision of water for annual panel cleaning and the one-off supply of firefighting water has been assumed to be delivered by tankers. The Applicant notes that water tankers used by commercial suppliers are available in a range of capacities, up to 30,000 litres (i.e. 30m^3). As such, annual panel cleaning would on average require one tanker every 3 days and the one-off supply for firefighting water for BESS Compound would result in approximately 12 tanker deliveries at the start of operation. As set out within the **OOEMP** (Doc Ref. 7.11 Rev 2), paragraph 2.4.2, it is expected that during the operational phase, the Scheme will be served by 10 full time staff and approximately 5 visitors per week (equating to one per day). As such, the Scheme is expected to attract a low level of vehicle trips during the operational phase, i.e. typically 11 vehicle arrivals and 11 vehicle departures daily (22 two-way daily movements). The tanker movements associated with annual panel cleaning would fall within the vehicle numbers assumed for visitors. The one-off water supply for BESS firefighting water falls within the envelope of assessment considered for the replacement of Scheme infrastructure. Paragraph 2.5.2 of the **OOEMP** (Doc Ref.

ExQ1	Question to:	Question:
		7.11 Rev 2) sets out that replacement of Scheme infrastructure is expected to generate up to a maximum of 40 HGVs (or 80 two-way HGV movements) per day, and up to 75 staff car trips (150 two-way movements) per day. As such, the movements associated with the one-off supply would be no worse than assumed for the replacement of Scheme infrastructure. Notwithstanding the assumptions used for the purposes of the ES, the Applicant has submitted a Non-Domestic Water Supply Request to Anglian Water Services to confirm if any additional water for the Scheme could be delivered through mains supply. At the time of writing, the Applicant is waiting for a response on this request. <u>Wastewater</u> Cesspits would be provided for the On-Site Substation Compounds, which would require emptying by a suitably licensed wastewater tanker. The size of the cesspit at each compound, and consequently the frequency at which they would need emptying, is subject to detailed design. However, typically the operational cesspits are not expected to be emptied more than once every 4-8 weeks. Vehicle movements associated with emptying the cesspits would fall within the allowance made for visitors to the Site during the operational period. <u>Accesses</u> Tankers for water supply and for wastewater removal would use the operational accesses shown on **ES Figure 2-5** (Doc Ref. 6.2 Rev 1). Tanker sizes may vary depending on the amount of water they need to carry. However, on a worst-case basis, a 30m^3 tanker is of an equivalent size to an articulated lorry. As illustrated within Annex B of the **OCTMP** [APP-278], the indicative access designs for the operational accesses can accommodate deliveries by HGVs.
Q18.0.26	The applicant	**Operational traffic** The OOEMP [REP1-063] says that opportunities would be sought to implement staff minibuses during the operational phase. Given there are to be 11 inbound movements per day to the scheme

ExQ1	Question to:	Question:
		during the operational phase, how likely does the applicant consider this to be achievable? Please also confirm if the 11 daily inbound vehicle movements already include the possibility of minibuses or if these are all LGV of single occupancy.
		The Applicant confirms that the operational traffic assessment assumes up to 22 two-way vehicle movements per day (11 inbound and 11 outbound movements) and represents a realistic worst-case assessment of operational traffic activity. This assessment has been undertaken on the basis of individual vehicle trips associated with staff, maintenance personnel and operational visitors and does not rely upon the implementation of staff minibuses to achieve the assessed traffic levels. Accordingly, the 11 inbound daily vehicle movements should be considered a robust assessment assumption and do not include any traffic reduction associated with potential staff minibus use. Should minibuses be utilised during operation, this would reduce the number of individual vehicle trips generated by staff and would therefore result in operational traffic levels that are lower than those assessed within the Environmental Statement. The Applicant therefore considers that the operational traffic assessment presents a reasonable worst-case scenario. The Applicant appreciates that the low number of staff on site during the operational phase, and the potential for those staff to be drawn from dispersed home locations, means that an operational staff minibus service may not ultimately be considered desirable or achievable. Because of this, the potential use of staff minibuses has been considered as a further mitigation opportunity that could further reduce operational traffic demand, and which will be investigated at the time the Scheme becomes operational, but has not been relied upon for the purposes of the assessment.
Q18.0.27	The applicant	**Operational traffic** ES Chapter 15: Traffic and Transport [APP-066] paragraph 15.8.77 explains that a site wide replacement of the solar PV panels, inverters, batteries and other equipment may be required.

ExQ1	Question to:	Question:
		Paragraph 15.8.78 provides anticipated vehicle movements associated with full replacement of infrastructure per day. Please clarify how long (i.e. in days) a full replacement of infrastructure would take place over. Please also explain why Appendix 15-4: Transport Assessment Note [APP-251] does not cover these vehicle movements.
		The daily operational trips presented within **ES Appendix 15-4 Transport Assessment Note (TAN)** [APP-251] represent the typical day-to-day operational traffic associated with the Scheme and do not include infrequent activities such as the replacement of site infrastructure. The purpose of the TAN was to outline routine operational traffic movements rather than exceptional maintenance or asset replacement events (if deemed necessary). The infrastructure replacement scenario presented in paragraph 15.8.78 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1) is intended to represent a reasonable worst-case assessment of the potential daily traffic generation associated with replacement activities, should such works be required during the operational life of the Scheme. It should not be interpreted as indicating that the entirety of the Scheme's solar PV panels, inverters, batteries and associated equipment would be replaced simultaneously. The Applicant confirms that any site-wide replacement programme would be planned and implemented over an extended period, likely spanning several years. Replacement works would be undertaken on a phased basis across specific sections of the Site as components reach the end of their operational life or require replacement, as set out within the **OOEMP** (Doc Ref. 7.11 Rev 2). Only relatively small areas of the Scheme are expected to be subject to replacement works at any given time, thereby allowing the wider Scheme to remain operational throughout the programme. Replacement works would be carefully programmed, phased and managed to minimise operational disruption and traffic impacts. An annual maintenance schedule for the year ahead would be submitted to the relevant planning authorities, as clarified within the **OOEMP** (Doc Ref. 7.11 Rev 2) updated for Deadline 3.

ExQ1	Question to:	Question:
		The timing, phasing and delivery arrangements for any significant infrastructure replacement programme would be developed in advance of the works and agreed with LCC, as appropriate. This would ensure that traffic management requirements and any associated highway considerations could be properly considered at the relevant time. The Applicant therefore considers it appropriate that the routine operational traffic assessment presented within the **TAN** [APP-251] excludes these infrequent replacement activities, with the potential effects of large-scale infrastructure replacement instead assessed separately within **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1) as part of the peak construction phase of assessment. This approach ensures that routine operational traffic and exceptional replacement activities are considered independently and proportionately.
Q18.0.28	The applicant	**Transport Assessment Note** A Transport Assessment Note [APP-251] has been submitted in support of ES Chapter 15 [APP-066]. Please signpost to where within ES Chapter 15 the traffic flow scenarios and turning calculations for each site access junction listed within table 15-5: Local Junction Receptors is detailed. Please also provide trip distribution and assignment maps showing the new trip routes across the surrounding road network. An example of this can be seen in Appendix 13-2: Traffic Flow Diagrams [APP-177] for the Fenwick Solar EN010152.
		The Applicant would like to clarify that the junctions detailed in Table 15-5 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1) are not site access junctions. Rather, they comprise the junction receptors located within the Traffic and Access Study Area which have been evaluated as part of the assessment of potential impacts and likely significant effects of the Scheme. These junctions are shown on **ES Figure 15-1: Traffic and Access Study Area** (Doc Ref. 6.2 Rev 1) and form part of the wider road network assessment.

ExQ1	Question to:	Question:
		The maximum peak hourly and daily two-way vehicle movements associated with each site access are not presented within Table 15-5. This information is provided in Annex A of the **OCTMP** [APP-278], which identifies the forecast worst-case vehicle movements for each proposed access point. The Applicant acknowledges the Examining Authority's request for trip distribution and assignment maps similar to those provided for the Fenwick Solar Farm DCO. The Applicant would note that Fenwick Solar Farm covers approximately 509 hectares, whereas the Meridian Solar Scheme covers approximately 1616 hectares. The Applicant therefore considers that maps of the sort produced for the Fenwick Solar DCO application would not be suitably legible for the purposes of showing trip distribution across the network due to the size and complexity of the Scheme and the need to produce separate diagrams for each trip distribution scenario summarised in Table 15-16 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1) and for each of the GCR Zones. The Applicant considers that sufficiently detailed information regarding trip distribution and assignment has been provided in **ES Figure 15-3: Heavy Goods Vehicles (HGV) Routing [APP-161]** and **ES Figure 15-5: Staff Trip Routing** (Doc Ref. 6.2 Rev 1), since each of these figures show how construction traffic vehicles will approach the site accesses. The resulting traffic flows are presented in Table 15-21 and in greater detail within **ES Appendix 15-3: Receptor Traffic Flow Tables** [APP-250].
Q18.0.29	The applicant	**Heavy goods vehicles** Please explain how HGVs would be prevented from accessing the OL during network peak hours. In addition, please set out the mitigation measures that would be implemented to protect vulnerable road users during school drop off and pick up periods, particularly along the B116 Hull's Drove in the vicinity of Shepeau Stow Primary School.

ExQ1	Question to:	Question:
		Please also signpost to where within the assessment documents the needs of pupils, parents, school staff and other users of the school have been considered and how this has informed the assessment and proposed mitigation measures.
		As stated in paragraph 7.4.15 of the **OCTMP** [APP-278], restrictions on HGV deliveries, including delivery timings, will be controlled by the Delivery Management System (DMS) and Traffic Management and Monitoring System (TMMS). This will be managed to ensure that no HGVs will travel to and from the Order Limits during the AM network peak periods of 08:00-09:00. Some HGV trips are anticipated to occur during the local network peak of 16:00 – 17:00. These are shown in **ES Appendix 15-3: Receptor Traffic Flow Tables** [APP-250]. With regards to Shepeau Stow Primary School, the school is located on Dowsdale Bank, which is adjacent to the section of the B1166 identified as receptor L25 in the assessment within **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1). Scheme traffic will not travel on Dowsdale Bank past the school itself, where the majority of pick ups and drop offs will occur. As shown in **ES Appendix 15-2: Traffic and Transport Significance Tables** [APP-249], L25 was assessed to record a minor effect on Road Safety and a negligible effect for all other assessment categories. As the primary school is located away from L25 itself, considering its presence in the vicinity of the B1166, the sensitivity assessment detailed in Table 15-23 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1) identifies the link as of very low sensitivity for pedestrian delay and Non-Motorised User Amenity. It should be noted that the receptor was assessed as being of "High" sensitivity for road safety, therefore ensuring a robust assessment. These sensitivities are in compliance with the sensitivity assessment criteria set out in Table 15-6 within the same document. Notwithstanding this, a specific control will be incorporated within the next iteration of the **OCTMP** [APP-278], to be submitted at Deadline 4, requiring the scheduling of HGV arrivals and departures to avoid HGV use of the B1166 through Shepeau Stow during the school start and finish periods.

ExQ1	Question to:	Question:
		The precise timing restrictions will be developed in consultation with Shepeau Stow Primary School to ensure they reflect the school's operational arrangements. This measure will sit alongside the existing controls secured through the DMS and TMMS, including delivery booking procedures, HGV routing controls and compliance monitoring, and will further reduce the potential for interaction between construction traffic and pupils, parents, school staff and other vulnerable road users travelling to and from the school.
Q18.0.30	The applicant	**Heavy goods vehicles** Please signpost to where the HGV and AIL routing strategies that are referred to in paragraph 7.4.9 of the OCTMP [APP-278] are located given there is no detail provided within this paragraph of the routing that would be taken.
		The Applicant would signpost to the routing strategies, which are presented in: • **ES Figure 15-3: HGV Routing** [APP-161], which identifies the routes to be used by Heavy Goods Vehicles (HGVs); and • **ES Figure 15-4: Abnormal Indivisible Load (AIL) Routing** (Doc Ref. 6.2 Rev 1), which identifies the routes to be used by AILs. These figures should be read alongside the **OCTMP** [APP-278], which sets out the measures that would be used to manage and enforce compliance with the approved routing strategy. In particular, paragraph 7.4.15 of the **OCTMP** [APP-278] provides for the implementation of a Delivery Management System (DMS) and Traffic Management and Monitoring System (TMMS), which would be used to control HGV deliveries, monitor vehicle movements and record compliance with the approved routing arrangements.

ExQ1	Question to:	Question:
		In addition, Section 7.4 of the **OCTMP** [APP-278] commits to restricting HGV and AIL movements to the approved routes, whilst Appendix C contains the swept path assessments that demonstrate the ability of AILs to travel along the approved route network to the relevant site access points. The combination of routing plans and management controls mentioned above constitutes the HGV and AIL routing strategy referred to in paragraph 7.4.9 of the **OCTMP** [APP-278].
Q18.0.31	The applicant	**Heavy goods vehicles** Paragraph 15.8.60 of ES Chapter 15: Traffic and Transport [APP-066] states that the magnitude of impact was initially assessed as 'low' due to a 10% increase in HGV flows during the PM network peak. This was reduced to very low on the basis that impacts at all other times of day were considered very low. Please explain what 'more appropriate' means in particular when there could be an increased safety issue at this time of day as there could be more HGVs on the network then.
		The Applicant would clarify that the reference to a "more appropriate" magnitude relates to the professional judgement applied when determining the overall magnitude of impact across the assessment period, rather than relying solely on the highest percentage change recorded during a single hour. The assessment identified that HGV flows on the relevant receptor exceeded the 10% threshold during the PM network peak hour, which initially corresponded to a Low magnitude of impact under the assessment criteria. However, during all other assessed periods, including the AM network peak, development peak periods and daily traffic flows, the change in HGV movements was assessed as Very Low. It should be noted that the PM network impact was 10.7%, which equates to 15 HGVs, therefore the absolute numbers of HGVs are low and the level of exceedance of the 10% threshold in a single hour is very limited. Accordingly, the Applicant considered it appropriate to determine the overall magnitude having regard to the pattern and duration of the impact across the day as a whole. The exceedance of the 10% threshold occurred during a single assessment period and did not persist across the wider assessment periods considered within the traffic assessment. The resulting HGV flows remained

ExQ1	Question to:	Question:
		relatively low in absolute terms and, when considered alongside the embedded mitigation measures secured through the **OCTMP** [APP-278], were not considered indicative of a sustained increase in HGV activity on the receptor. The Applicant does not suggest that impacts occurring during the PM peak period are unimportant. Rather, the Road Safety assessment specifically considered whether the forecast increase in HGV movements could give rise to a material safety concern. This assessment concluded that the effect remained Minor (not significant), once the forecast traffic flows, the temporary nature of the construction phase, the implementation of designated HGV routing, the Delivery Management System, routing compliance monitoring and other traffic management measures secured through the **OCTMP** [APP-278] were taken into account. The Applicant therefore considers that suitable professional judgement has been applied to avoid placing undue weight on a single hourly, very limited, exceedance that is not representative of traffic conditions during the entire 24-hour period. The conclusion that the overall magnitude is Very Low reflects the fact that the increase in HGV traffic is limited to a short duration, occurs within the context of generally low changes in HGV flows during other assessment periods and does not result in a significant road safety effect.
Q18.0.32	The applicant	**Large loads** There are a number of references to 'large loads' throughout ES Chapter 15: Traffic and Transport [APP-066] however there is no definition of what a large load is. Please provide a definition of what a large load is referring to throughout the ES and include this definition within ES Chapter 15: Traffic and Transport [APP-066].
		The Applicant confirms that in the context of the Scheme, a 'Large Load' is intended to refer to a goods vehicle weighing over 3.5 tonnes, as identified within Table 15-8 of the **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1).

ExQ1	Question to:	Question:
		The Applicant notes that the term is not currently defined within the **OCTMP** [APP-278]. To provide clarity and ensure consistent interpretation across the construction traffic documentation, the Applicant will update the OCTMP at Deadline 4 to include this definition of "large load".
Q18.0.33	The applicant	**Baseline traffic flows** Please confirm why J6 B1168 Raven's Gate/ B1165 Raven's Bank is included in table 15-18 of ES Chapter 15: Traffic and Transport [APP-066] when it is not identified on ES figure 2-5 [APP-077] for HGVs travelling in that direction?
		The Applicant confirms that Receptor J6 is not located on the proposed HGV or AIL routing strategy and is therefore not identified as part of the HGV or AIL routes as shown on **ES Figure 15-3 [APP-161]** and **ES Figure 15-4** (Doc Ref. 6.2 Rev 1). However, the assessment network was not defined solely by HGV and AIL movements. Receptor J6 is expected to be used by a proportion of construction workforce traffic and other light vehicle movements associated with the Scheme. As shown on **ES Figure 15-5** (Doc Ref. 6.2 Rev 1), a number of staff trips are forecast to travel through this junction during the construction phase. Accordingly, J6 was included within the assessment to ensure that all junctions potentially affected by development traffic, including staff vehicle movements, were appropriately considered. Its inclusion therefore reflects its role within the wider construction traffic assignment rather than its relevance to HGV or AIL routing. Therefore, the inclusion of receptor J6 within Table 15-18 is appropriate and consistent with the assessment methodology, which considers the effects of all development-related traffic rather than HGV and AIL movements alone.
Q18.0.34	The applicant	**Traffic assessment**

ExQ1	Question to:	Question:
		Given Back Bank is shown as a HGV and AIL route on ES figure 2-5 [APP-077], why was no traffic count data collected for this road (ES figure 15-1 [APP-159])?
		The Applicant would clarify that Back Bank is located on the same stretch of route corridor as Eaugate Road and Chapel Hill, which were both surveyed for the Scheme and are identified as receptors L26 and L27 respectively within **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1). The traffic surveys undertaken at these locations were considered to provide representative baseline traffic data for this section of the local highway network. A separate traffic survey of Back Bank was therefore considered unnecessary, as traffic flows along Back Bank could be derived from and reasonably represented by the traffic surveys collected at receptors L26 and L27. Accordingly, sufficient baseline information was available to characterise existing traffic conditions and assess the impact of development traffic on this route corridor.
Q18.0.35	The applicant	**Traffic assessment** Table 15-21 of ES Chapter 15: Traffic and Transport [APP-066]. For the 18-hour weekday column, please provide this including HGV numbers within the base flow, development flow and percentage increase presented in brackets.
		The Applicant confirms that the 18-hour HGV traffic flow data (including base flow, development flow and percentage increase) is already provided in **ES Appendix 15-4** [APP-251]. The Applicant therefore does not consider it necessary or proportionate to replicate this information within Table 15-21 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1), as doing so would duplicate information already contained within the application documents. The purpose of Table 15-21 is to present the overall traffic flow assessment, whilst the more detailed breakdown of HGV flows is provided separately within **ES Appendix 15-4** [APP-251].
Q18.0.36	The applicant	**Traffic assessment**

ExQ1	Question to:	Question:
		In respect of table 15-21 of ES Chapter 15: Traffic and Transport [APP-066], Barrier Bank, James Road, Langary Gate Road, B1166 Long Lane, and Martins Road are all classified as being of low sensitivity which "can accommodate change without material effect". Given the geometry of these roads and the very high percentage change predicted, please explain how these roads have been assessed as having the ability to accommodate the proposed change in volume of traffic without material effect.
		The sensitivity criteria which have been adopted for this assessment are outlined in Tables 15-6, 15-7 and 15-8. As stated in paragraph 15.4.24 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1), these criteria have been defined using a combination of IEMA guidelines and professional experience and were previously established at the PEIR and EIA Scoping stages of the Scheme. Each of the receptors cited in this comment have been assessed according to these criteria, with the justifications for each assessment included in the relevant receptor sensitivity tables in section 15.8 of the **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1). The Applicant does not recognise the quote cited in this comment that low sensitivity receptors "can accommodate change without material effect", as this definition of low sensitivity is not included in the ES Chapter or in the IEMA guidance. The Applicant does not therefore consider its assessment to have been carried out on this basis. High percentage change in traffic flows pertain to the magnitude of impact and not the sensitivity, as indicated by Table 15-9. Relating to the geometry of the road, the Applicant has met with LCC's Highways Officer and is due to submit its passing place proposals for Martin's Road and Langary Gate Road for review. Following this review conducted by LCC, the Applicant anticipates that these proposals will be entered into the examination at Deadline 4. However, the Applicant will inform the Examining Authority if an update to this timeframe needs to be provided.
Q18.0.37		**Traffic assessment**

ExQ1	Question to:	Question:
	Lincolnshire County Council	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.
Q18.0.38	Lincolnshire County Council	**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.
Q18.0.39	The applicant Lincolnshire County Council	**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. 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].
		Paragraph 15.8.55 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1) sets out that the magnitude of impact for Road Safety was assessed using the same assessment (magnitude) criteria used to evaluate Severance and Pedestrian Delay (outlined in Table 15-9). The sensitivity evaluation criteria for Road Safety are outlined in Table 15-8.

ExQ1	Question to:	Question:
		The Road Safety assessment considered forecast changes in both total traffic flows and HGV flows. Whilst the magnitude criteria are based on the overall change in traffic flows, HGV movements were also reviewed qualitatively because of their greater potential to influence road safety due to their size and operating characteristics. As stated in paragraph 15.8.56, receptors which have initially been assigned either Medium or High magnitudes which would result in Moderate or Major effects, i.e. a "significant" effect, have been considered qualitatively and in greater depth to determine whether their magnitudes are considered accurate. To use L21 Barrier Bank as an example: receptor L21 was judged to have 'Low' sensitivity with regard to Road Safety since it recorded 3 collisions (of which one was serious) in the most recent five-year period for which Personal Injury Collision (PIC) data exists. This is consistent with the sensitivity criteria for Road Safety outlined in Table 15-8. As stated in 15.8.58, although the magnitude for L21 was initially assessed as 'High' on the basis of traffic flow increases in the AM and PM construction peaks as a result of the Scheme (shown in **ES Appendix 15-3** [APP-250]), it was observed that the sum of the baseline AM and PM peak flows and the AM and PM Scheme trips were smaller than the total vehicle trips in the AM and PM shoulder Peaks (07:00 – 08:00 and 17:00 – 18:00 respectively) recorded in the 2025 traffic surveys (i.e. before traffic growth factors were applied to estimate 2031 flows), indicating that the Scheme would not result in the link carrying greater volumes of traffic than it does at present. On this basis, the magnitude at this receptor was downgraded from 'High' to 'Medium'. Accordingly, the receptor was judged to experience a Minor effect, which is not significant. In relation to HGVs specifically, the forecast increase in HGV movements on L21 was also considered as part of this review. Whilst HGV numbers increase during the construction phase, the absolute number of additional HGV movements remains relatively low and the link is already used by HGVs. Accordingly, the forecast HGV movements were not considered likely to give rise to a materially greater road safety risk than existing conditions or to alter the conclusion reached by the

ExQ1	Question to:	Question:
		assessment. On this basis, the conclusion that the magnitude of impact would be Medium and therefore the link would experience a Minor effect (not significant), was retained.
Q18.0.40	The applicant	**Workforce travel** The Relevant Representations Report [REP1-074] says that the modal split for the use of shuttle bus services of 55% would be facilitated through a number of measures that would be developed through the detailed CTMP. However, as no outline Travel Plan has been provided as part of OCTMP ([APP-278] and [REP1-067]), can the applicant please signpost to how the mitigation measure of a 55% modal use of the shuttle bus would be enforced and what anticipated route(s) would the shuttle bus be expected to travel.
		The Applicant would clarify that although an individual Outline Travel Plan has not been provided as part of the DCO application, the **OCTMP** [APP-278] incorporates a range of workforce travel measures, such as promotion of car sharing and provision of a shuttle bus service and the management of on-site parking. This is a typical approach for Solar NSIP projects, with a separate Travel Plan document to be produced by the Contractor alongside the Detailed CTMP at the time of construction, building upon the measures secured through the **OCTMP** [APP-278]. The Applicant further notes that the use of shuttle buses is a commonly used mitigation measure for Solar DCOs, with a 55% modal split being a commonly adopted percentage of workers able to travel via shuttle bus, as evidenced by the DCO applications for Gate Burton Energy Park, Beacon Fen Energy Park and Longfield Solar Farm, all of which have been granted consent by the Secretary of State. A detailed shuttle bus service strategy, secured through the OCTMP [APP-278] and forming part of the detailed CTMP, will be designed closer to the construction phase when more details on home locations of the workforce and contractor arrangements are known. This will allow a targeted approach to delivery to be established. The shuttle bus service strategy will identify pick up points for staff based on home and/or temporary accommodation locations. This will include convenient

ExQ1	Question to:	Question:
		locations in population centres, or along routes with multiple population centres. The detailed strategy will review the need for further measures such as allocation of parking or shuttle permits to staff based on criteria such as home location or job role. With regard to routing, paragraph 7.5.13 of the **OCTMP** [APP-278] states that shuttle bus services would, where reasonably practicable, travel to and from the construction compounds using the same strategic routes identified for HGVs on **ES Figure 15-3: HGV Routing [APP-161]**. This approach has been adopted to minimise traffic impacts on local roads and to utilise the routes assessed within the construction traffic assessment. Accordingly, whilst the final shuttle bus routes and operational arrangements will be determined through the detailed design process, the provision of shuttle bus services is secured through the **OCTMP** [APP-278] and forms part of the embedded mitigation assessed within **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1). The Detailed CTMP and associated Travel Plan will provide the mechanism for implementing, monitoring and refining these arrangements during construction.
Q18.0.41	The applicant	**Outline Construction Traffic Management Plan** Please comment on LCC's request within their LIR [REP1-106] for the OCTMP ([APP-278] and [REP1-067]) to include a reference to the need for future technical approvals.
		The Applicant does not consider that the amendment requested by LCC is necessary, as this is covered in the wording of the **Draft DCO** (Doc Ref. 3.1 Rev 3) Notwithstanding, the Applicant wishes to work collaboratively with LCC. The Applicant has therefore agreed to this amendment and will therefore include a paragraph within the next iteration of the OCTMP (at Deadline 4) confirming that the detailed design of construction accesses, temporary traffic management measures, passing places and any other highway works requiring technical approval will be progressed through the appropriate approval process with the relevant highway authority prior to implementation.
Q18.0.42	The applicant	**Outline Construction Traffic Management Plan**

ExQ1	Question to:	Question:
		Paragraph 5.2.3 of the OCTMP [APP-278] states that it is assumed the road surface of access points along the GCR would be removed once construction is complete. Why is it only 'assumed'? why should the accesses not be removed and the land reinstated to its previous condition?
		For access points installed specifically to facilitate the construction of the GCR, paragraph 5.2.3 of the **OCTMP** [APP-278] outlines the Applicant's intention that the temporary surfaced access arrangements will be removed following completion of the construction works. The Applicant has proposed this approach to minimise the presence of visual indicators of access locations during the operational phase, thereby reducing the potential for unauthorised access, fly-tipping and other activities that could adversely affect the surrounding agricultural land. However, whilst the temporary surfacing associated with these construction accesses is intended to be removed, the Applicant intends that certain enabling works required to establish the accesses may remain in place where appropriate. For example, infrastructure such as culvert widening works or other modifications required to facilitate occasional maintenance or emergency access to the grid connection corridor may be retained. The use of the term "assumed" in paragraph 5.2.3 is therefore intended to recognise that the final reinstatement requirements may vary depending on the specific characteristics of each access location and any agreement reached with the relevant landowner. The Applicant acknowledges, however, that the wording could be interpreted as creating uncertainty regarding the extent of removal of temporary access surfacing. To provide greater clarity, the Applicant will review and update paragraph 5.2.3 within the next iteration of the OCTMP (Deadline 4) to confirm that temporary surfaced access roads constructed solely for the purposes of the GCR construction works will be removed following completion of construction and the land reinstated appropriately, whilst recognising that certain permanent engineering works, such as culvert improvements, may be retained where required to facilitate future maintenance or emergency access to the operational grid connection infrastructure.

ExQ1	Question to:	Question:
Q18.0.43	The applicant	**Outline Construction Traffic Management Plan** Please explain why it is necessary for the items listed within paragraph 7.4.14 of the OCTMP [APP-278] to be undertaken outside of core working hours, in particular the installation of conductors, pilot wires and protective netting/ testing of electricals/ non-intrusive and intrusive surveys/ concrete pours.
		The Applicant has highlighted a range of construction activities that may be undertaken outside of core working hours to ensure that works that present a safety hazard to road users can be undertaken at a time which minimises any associated risks. In particular, activities such as the installation of conductors, pilot wires and protective netting may require temporary traffic management, road crossings or works in proximity to the highway network. Undertaking these activities outside peak traffic periods can reduce interaction with road users and minimise associated safety risks. Similarly, certain surveys may be undertaken outside core working hours where this reduces impacts on the travelling public or enables safe access to locations without disrupting highway operations. Testing and commissioning of electrical infrastructure may need to be coordinated with wider network requirements or undertaken as continuous activities once commenced. Likewise, concrete pours are often undertaken as continuous operations and may need to extend beyond core working hours to ensure the quality and structural integrity of the finished asset. The activities identified in paragraph 7.4.14 of the **OCTMP** [APP-278] are therefore not expected to routinely occur outside core working hours. Rather, the Applicant has highlighted those activities for which flexibility may be required, particularly where undertaking the works outside normal working hours can reduce disruption and ensure that activities presenting a potential safety hazard to road users are undertaken at a time that minimises associated risks.

ExQ1	Question to:	Question:
		Any such activities would be managed in accordance with the relevant provisions of the **OCTMP** [APP-278] and other approved management plans, with appropriate mitigation measures implemented where necessary.
Q18.0.44	The applicant Lincolnshire County Council	**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 Applicant confirms that Annex C of the **OCTMP** [REP1-067] has been prepared to provide vehicle swept path analysis of the surrounding local road network to demonstrate that AIL manoeuvres, under escort, can safely navigate the proposed route to the Scheme without requiring widening works to the local highway network. Accordingly, the blue circles shown within Annex C identify those locations on the wider highway network where swept path assessments have been undertaken to verify the ability of AIL vehicles to negotiate junctions, bends and other constrained highway features along the route to the Site. These assessments are therefore route-based and are intended to demonstrate the suitability of the highway network for AIL movements. The purpose of Annex C is not to demonstrate how AIL vehicles enter the Order Limits from the public highway. The detailed swept path assessments associated with individual site access points are provided separately within Annex B of the **OCTMP**, which is contained within **Part 1** [APP-278] and **Part 2** [REP1-067] of the OCTMP. Annex B includes the engineering drawings and swept path

ExQ1	Question to:	Question:
		analyses demonstrating how the relevant design vehicles, including AIL vehicles where required, can safely access and egress the Scheme at each access location. In summary, Annexes B and C perform different functions: • Annex C demonstrates that AIL vehicles can safely travel along the proposed route on the wider highway network; and • Annex B demonstrates that AIL vehicles can safely enter and exit the Scheme via the proposed access locations.
Q18.0.45	The applicant	**Road condition surveys** Paragraph 7.4.2 of the OCTMP [APP-278] lists roads that would be subject of pre/ post road condition surveys. Please clarify why Wiseman's Gate at HR-03 or Runway RW-01 have not been included within this list. Paragraph 7.4.4 states a separate road condition survey may be carried out for AIL routes where there are turning movements and the potential for vehicle overrun of kerbs or soft estate and defects that arise. Please explain the rationale for using the term 'may' rather than 'should' and whether the applicant considers the measure to be discretionary or expected to be implemented in all circumstances.
		The Applicant notes the Examining Authority's comment in regard to Wiseman's Gate (HR-03) and Runway (RW-01). These are omissions and shall be included in the updated **OCTMP** [APP-278] at Deadline 4. In relation to paragraph 7.4.4, the Applicant confirms that it will amend the wording from 'may' to 'shall' at Deadline 4.

ExQ1	Question to:	Question:
		The Applicant would further note that the detailed list of roads subject to a separate road condition survey are to be agreed with Lincolnshire County Council based upon forecasted utilisation for AIL movements.
Q18.0.46	The applicant	**Grid Connection Route crossing points** The GCR has a number of crossing points which are proposed to be laid with hardstanding. Please clarify whether the areas of hardstanding at each crossing point would be removed at the end of the construction period and how their removal would be secured. If they are not to be removed, please explain why they would need to be retained.
		All bellmouths and highway crossing points within the Grid Connection Route will be temporary and will only be required throughout the construction phase. The only permanent accesses are those proposed to the two Cable Sealing End Compounds. Upon completion of the construction works, the bellmouths and crossing points will be removed. This is secured through the **OCTMP - Part 1 [APP-278]**, paragraph 5.2.3 which states that for the construction access points on the Grid Connection Route, it is assumed that the road surface of these accesses will be removed once construction is complete. As noted in the response to Q18.0.42, the Applicant will review and update paragraph 5.2.3 within the next iteration of the OCTMP (at Deadline 4) to remove uncertainty associated with the term 'assumed' and confirm that temporary surfaced access roads constructed solely for the purposes of the GCR construction works will be removed following completion of construction and the land reinstated appropriately, whilst recognising that certain permanent engineering works, such as culvert improvements, may be retained where required to facilitate future maintenance or emergency access to the operational grid connection infrastructure.
Q18.0.47	The applicant	**Inter-Array and Grid Connection Route crossing points** Please clarify the following based on information in table 7-1 within the OCTMP [APP-278]:

ExQ1	Question to:	Question:
		• Chapel Gate and Dog Drove are identified as crossing points for construction traffic. Please clarify why over a period of four weeks it is anticipated there would be numerous closures of these roads. • Why Moulton Chapel Road has a partial closure when Delgate Bank is identified as a full closure. • Why West Gate and Whirl Gate are identified for full closure when other crossing points are identified for partial closure.
		The Applicant has identified a construction duration of up to four weeks and a number of proposed closures to allow flexibility for the appointed contractor to sequence the works which need to be constructed in this location. This includes: • The construction of the access footprint and the associated surface tie in works to the existing carriageway on Chapel Gate and Dog Drove. • The installation of overhead cabling for the inter-array corridor. The Applicant has sought to differentiate roads where partial or full road closures will be required, and the difference in strategy is attributed to the existing carriageway cross section of the road in question. The Applicant has identified a partial closure for Moulton Chapel Road where traffic flow could be maintained under traffic management or signal control, whereas full closures have been identified on carriageways such as Delgate Bank, where the Applicant has judged that maintaining traffic flow is unlikely to be able to be undertaken safely. These principles also reflect the decisions made by the Applicant in respect of both West Gate and Whirl Gate. The closure requirements presented within Table 7-1 of the **OCTMP** [APP-278] are indicative at this stage and will be refined through detailed design, construction planning and consultation with the relevant highway authority. The final traffic management arrangements will be developed by the appointed contractor and agreed with the relevant highway authority prior to implementation.

ExQ1	Question to:	Question:
Q18.0.48	The applicant Lincolnshire County Council	**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.
		Traffic Flows Presented in Tables 15-36 and 15-37 of ES Chapter 15: Traffic and Access (Doc Ref. 6.1 Rev 1) The Applicant confirms that, as stated in paragraph 15.11.12 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1), the traffic flows presented in Tables 15-36 and 15-37 do not include traffic associated with the Scheme. These tables present the cumulative traffic flows associated with the screened-in cumulative developments identified within the assessment and are intended to demonstrate the effect of those developments on the future baseline traffic conditions. Percentage Increases The Applicant confirms that the percentage increases presented within the 'Cumulative Increase (%)' column represent the increase between the relevant future baseline traffic scenario without the

ExQ1	Question to:	Question:
		screened-in cumulative developments and the future traffic scenario with the total traffic flows from the screened-in cumulative developments included. Accordingly, the percentages illustrate the proportional change in traffic flows attributable to the cumulative developments relative to the future baseline conditions. <u>Further Assessment Incorporating Scheme Traffic</u> Paragraph 15.11.18 states that, where a minor impact has been identified, a further assessment incorporating Scheme traffic has been undertaken. This approach is consistent with the methodology set out in paragraph 15.11.6 of **ES Chapter 15 Traffic and Access** (Doc Ref. 6.1 Rev 1), which states: "*A key consideration for the cumulative assessment, which forms the foundation for the Inter-Project Cumulative Assessment, is that if the Scheme is expected to result in a Negligible effect for a given receptor and assessment, then there is considered to be no potential for a cumulative effect to arise when combined with other projects, including when combined with all cumulative schemes*." Consistent with this methodology, where the assessment identified the significance of effect arising from total cumulative traffic flows was negligible, no further assessment incorporating Scheme traffic was undertaken. The Applicant considered that, in such circumstances, there would be no realistic potential for the Scheme to give rise to a significant cumulative effect when combined with other developments, and that the assessment of the Scheme in isolation has already been undertaken. The further assessment incorporating Scheme traffic was therefore focused on those receptors where the initial cumulative assessment identified at least a minor effect, as these represented the locations where additional consideration of the Scheme's contribution to cumulative traffic conditions was warranted.

ExQ1	Question to:	Question:
		The Applicant therefore considers that the approach adopted is proportionate, consistent with the agreed assessment methodology, and appropriately focussed on those receptors where there was potential for cumulative effects to arise.
Q18.0.49	The applicant	**Public rights of way** Paragraph 15.6.7 of ES Chapter 15: Traffic and Transport [APP-066] states that ES Figure 15-1 [APP-159] shows the locations of the PRoW that pass through or near the vicinity of the site. Figure 15-1 does not show this. Please confirm if this is a typo.
		The Applicant has reviewed paragraph 15.6.7 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1)and confirms that the reference to Figure 15-1 [APP-159] is incorrect. The reference should be **ES Figure 15-2** [APP-160], which shows the locations of the Public Rights of Way (PRoW) that pass through or are located within the vicinity of the Scheme. The Applicant has corrected this error within the updated **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1 Rev 1) submitted at Deadline 3. This typo does not affect the assessment methodology, findings or conclusions of the Traffic and Transport assessment.
Q18.0.50	The applicant	**Outline Operational Environmental Management Plan** Table 3-12: Traffic and Access of the OOEMP [REP1-063]. Please check the reference to ES figure 2-6 [APP-078] is correct.
		The Applicant has reviewed the reference contained within Table 3-12 (Traffic and Access) of the **OOEMP** [REP1-063] and confirms that the reference to Figure 2-6 [APP-078] is incorrect. The reference should be ES Figure 2-5 (Doc Ref. 6.2), which identifies the operational access arrangements associated with the Scheme. The reference has been corrected in the **OOEMP** (Doc Ref. 7.11 Rev 2) submitted at Deadline 3.

ExQ1	Question to:	Question:
		This typo does not alter the assessment, mitigation measures or conclusions presented within the OOEMP.

2.19. Water Environment (including Water Framework Directive Assessment and Flood Risk Assessment)

2.19.1. The below table sets out the Applicant's response to the ExA's written questions relating to water environment (including Water Framework Directive Assessment and Flood Risk Assessment).

Table 2.19-1: Water environment (including Water Framework Directive Assessment and Flood Risk Assessment)

ExQ1	Question to:	Question:
Q19.0.1	Anglian Water Services Environment Agency	**Water Supply Strategy** The applicant has submitted a Water Supply Strategy [REP2-019]. Please provide your response to this with reference to policy requirements and current guidance, including on the potentially outstanding issues of rainwater harvesting and fire water.
Q19.0.2	The applicant Environment Agency	**Foul water** The applicant proposes to manage foul water during operation with a 'cesspit' [APP-227]. Table 3-7 of the OCEMP [REP1-061] states that 'Scheme construction foul drainage is expected to be provided by self-contained cesspits (or similar sealed tank), regularly emptied by a waste management contractor'. • The applicant must confirm how many cesspits would be required during both construction and operation, and where these would be located. • Please can the Environment Agency (EA) confirm that the principle of discharging to cesspits is acceptable to them? • The applicant should review the documentation for reference to other forms of discharge where this may be misleading. For example, sheet 5 of the Indicative and Illustrative Layout Plans and Sections [APP-019] shows discharge to a septic tank.
		ES Appendix 11-4: Outline Drainage Strategy [APP-227], paragraph 5.9.1 confirms that there are no public sewers within 30m of the On-Site Substation Compounds. The Environment Agency has

ExQ1	Question to:	Question:
		advised 30m as the distance within which connection to the public sewer must be made. Therefore, a cesspit would be provided at the main construction compounds (four in the Solar Development area and three in the Grid Connection Route) and at the four permanent On-Site Substations, which include welfare facilities. The remaining secondary construction compounds within the Solar Development Area would be served by portaloos with an effluent tanks. All these arrangements would be located within the parameters defined for the compounds. The foul wastewater that collects within the cesspits will be routinely pumped out to a tanker and removed from the Site for off-site disposal via a suitable waste facility. No on-site discharge into a watercourse or to ground is proposed. The Applicant confirms that whilst Sheet 5 of the **Indicative and Illustrative Layout Plans and Sections** (Doc Ref. 2.8 Rev 1) shows a septic tanks and discharge into a local watercourse, this is not proposed for the Scheme. In accordance with the **OCEMP** (Doc Ref. 7.10 Rev 3), cesspits would be provided instead at temporary compound locations. An updated plan has been submitted at Deadline 3 to reflect this.
Q19.0.3	The applicant Environment Agency Any interested parties	**Scope of Environmental Statement assessment – secondary aquifers** Groundwater was scoped out of the ES on the basis that the underlying geology was unproductive. However, paragraph 11.6.6 of ES Chapter 11 [REP1-020] states that "Some superficial deposits between Crowbit and Crowland are classed as Secondary A and Secondary (undifferentiated) aquifers. However, these are only likely to yield limited amounts of water and be of limited importance at a local level". • Please can the applicant provide a map of the secondary aquifer(s) and confirm that there are no private abstractions from these? • The EA and any other IPs are invited to provide comments in relation to the conclusions of the ES on this matter.

ExQ1	Question to:	Question:
		The Applicant has provided a map of secondary aquifers within **Appendix G** of this document. The Applicant contacted South Holland District Council to request details of Private Water Supplies (PWS) within the Order Limits. A response was received in June 2025, which confirmed that there are no known groundwater or surface water PWS within the Order Limits (refer to paragraphs 11.6.27 and 11.6.60 of **ES Chapter 11: Hydrology and Flood Risk** [REP1-020]). The Applicant is of the opinion that groundwater should remain scoped out of the assessment as the hydrogeological setting indicates a low sensitivity groundwater environment with no plausible pathway to significant groundwater receptors. The Site is underlain by Unproductive Strata bedrock, which has negligible groundwater storage and transmissive capacity and is therefore incapable of supporting groundwater abstractions of significance. As a result, the bedrock does not constitute an important groundwater resource and is unlikely to support groundwater dependent terrestrial ecosystems (GWDTEs) (none have been identified) or provide a meaningful contribution to surface water flows through groundwater discharge. The superficial deposits within the Order Limits comprise limited and isolated bodies of Secondary Undifferentiated Aquifers associated with tidal flat deposits. These deposits are discontinuous both laterally and vertically and are surrounded by predominantly low permeability silts and clays, which significantly restrict groundwater movement and hydraulic connectivity. Consequently, any groundwater flow within these deposits is likely to be highly localised. A Secondary A Aquifer is mapped in association with the River Welland/New River, outside the Order Limits. This aquifer is restricted to the immediate vicinity of the watercourse and is likely to have developed as a result of fluvial erosion and alluvial deposition. The River Welland is low down in its catchment where it passes the Site becoming tidal downstream of Spalding. Given the low relief and heavily drained nature of the surrounding catchment, local inputs into the River Welland

ExQ1	Question to:	Question:
		are considered to be predominantly surface runoff and land drainage inputs rather than local groundwater baseflow. The superficial aquifers are isolated and localised groundwater bodies rather than components of a laterally extensive or hydraulically connected aquifer system. Groundwater flow is expected to be restricted to short flow paths within individual deposits, with negligible potential for the transmission of effects beyond the immediate vicinity of the Site. Given the absence of a regionally important groundwater resource, GWDTEs, licenced or private groundwater abstractions, or plausible hydraulic connectivity between the Site and surrounding receptors by which significant groundwater effects could arise. On this basis, groundwater is not considered a significant receptor and should remain scoped out of further assessment. Furthermore, the **OCEMP** (Doc Ref. 7.10 Rev 3), **OOEMP** (Doc Ref. 7.11 Rev 2) and **ODEMP** (Doc Ref. 7.12 Rev 2) incorporate embedded measures to protect groundwater and surface water resources throughout all phases of the Scheme. As such, appropriate pollution prevention and environmental management controls will be implemented to minimise the potential for contamination and ensure that significant effects on groundwater are unlikely to occur.
Q19.0.4	The applicant	**Water quality** The Indicative and Illustrative Layout Plans and Sections [APP-019] states that the soil bund around the compounds will be designed with suitable gaps/ drainage pipes to allow water flow in flood conditions. Explain: • How this setup works in relation to protection from flooding. • How containment of any contaminated water is ensured.
		Bunding shown on Sheet 5 of **Indicative and Illustrative Layout Plans and Sections** (Doc Ref. 2.8 Rev 1) is for the storage of soils, which would be reinstated following the removal of the temporary construction compound. It is not intended to provide protection from flooding. Flood protection is

ExQ1	Question to:	Question:
		provided through the provision of safe refuge by locating a welfare cabin either on a raised platform or stacked on top of the ground floor unit above worst-case modelled flood levels with 300mm freeboard, as set out with the **OCEMP** (Doc Ref. 7.10 Rev 3). In accordance with the **OCEMP** (Doc Ref. 7.10 Rev 3), a temporary drainage system will be developed to prevent runoff contaminated with fine particulates from entering surface water drains without treatment. The risk to surface water and groundwater from run-off from any stockpiles during construction works will be reduced by implementing suitable measures to minimise sediment washing off stockpiles and/or capturing and treating the runoff. These mitigation measures will be designed in line with current good practice, follow appropriate guidelines and all relevant licenses/permits, as set out within the **OCEMP** (Doc Ref. 7.10 Rev 3). There are numerous and effective ways to manage fine sediment in runoff. Sheet 5 of **Indicative and Illustrative Layout Plans and Sections** (Doc Ref. 2.8 Rev 1) shows there to be an interceptor ditch in front of the bund with occasional check dams that may consist of straw bales or gravel. This will be passed through an additional settlement / filtration system prior to discharge from the site. This may use construction SuDS or a proprietary measure as required.
Q19.0.5	Environment Agency	**Water quality monitoring, baseline dataset and mitigation measures** The EA has raised several questions about the adequacy of water quality monitoring, baseline information and proposed mitigation, including questions EA34 to EA44 [RR-047]. The applicant has responded to these at DL2 [REP1-074]. Please confirm that you are satisfied with these responses or, if not, why not, setting out in detail your remaining concerns.
Q19.0.6	The applicant	**Water Framework Directive**

ExQ1	Question to:	Question:
	Environment Agency	At DL3, provide an update on progress towards resolving the outstanding issues in the EA SoCG [REP2-010] and the EA's 'comments on any other information or submission received by deadline 1' [REP2-023].
		An updated **Statement of Common Ground with Environment Agency** (Doc Ref. 8.12 Rev 2) has been submitted at Deadline 3. Applicant's full responses to the comments raised by the Environment Agency at Deadline 2 are also provided within **Applicant's Comments on Deadline 2 Submissions** (Doc Ref. 8.38).
Q19.0.7	Environment Agency	**Sensitivity testing for climate change** The EA requires further justification to demonstrate why the chosen return interval and climate change scenarios for each catchment represent a suitably conservative approach to assessing the 'credible maximum', particularly where they differ from the methodology set out in the Government guidance, 'Flood Risk Assessment: Climate Change Allowances', for example in [REP2-010]. Please set out what this guidance requires, how the applicant's approach differs and the potential consequences of this approach.
Q19.0.8	The applicant Environment Agency	**Review of Hydraulic Modelling Files** The ExA notes the update at DL2 [REP2-010] regarding the EA's review of hydraulic modelling. This includes confirmation that it is now satisfied with the approach taken for the River Welland but awaits further information in relation to the Postland Catchment and South Holland Main Drain. These conclusions are based on discussions and reporting between the two parties. Provide an update on these discussions at the next deadline and submit the details of discussions into the examination as soon as possible after concluding.
		An updated **Statement of Common Ground with Environment Agency** (Doc Ref. 8.12 Rev 2) has been submitted at Deadline 3, which includes an update on the discussions with regards to hydraulic

ExQ1	Question to:	Question:
		modelling. The Applicant has now provided the EA further information in relation to the Postland Catchment and South Holland Main Drain modelling and awaits for the EA's response to the information provided. The Applicant intends to update **ES Appendix 11-3: Flood Risk Assessment** [REP1-050] at Deadline 4 to reflect the EA's hydraulic modelling comments, albeit it is noted that no changes to the modelled Flood Zone extents are anticipated to be made.
Q19.0.9	The applicant	**Updates to the Flood Risk Assessment in response to amendments to the scheme and inclusion of stockpiling** Amendments to the scheme have been made at DL1, including to secure flood risk mitigation for any CSECs within the Work No. 14 area [REP1-094]. Confirm: • That the Flood Risk Assessment (FRA) [REP1-050] remains up to date considering this amendment and any other relevant changes. • If stockpiles have been accounted for in the assessment of flood risk and, if not, why not.
		The Applicant confirms **ES Appendix 11-3 Flood Risk Assessment** [REP1-050] will be updated at Deadline 4 with regards to any CSECs that are proposed within Work No. 14 area, and relating to permanent bunding / provision of a flood protection wall for these CSEC(s). The mitigation is also set out in **Design Parameters** (Doc Ref. 7.4 Rev 3) to note that a bund or a flood protection wall and gate would be provided around any CSEC within the Work No 14 area, to a maximum height of 2.3m above ground level. In summary, the updates are not considered to result in changes to the overall conclusions on flood risk.
Q19.0.10	The applicant	**Flood risk modelling** The FRA [REP1-050] assesses fluvial flood risk from three catchments (the River Welland, the Postland Catchment, the South Holland Main Drain catchment). Paragraph 5.3.27 of the FRA states that where models overlap, a worst-case scenario has been used. However, it is not clear if this is from a single model or considers two or more catchments flooding at the same time. The applicant

ExQ1	Question to:	Question:
		is requested to provide detail on how a scenario where multiple catchments flood at the same time has been considered.
		ES Appendix 11-3 Flood Risk Assessment [REP1-050] assesses fluvial flood risk from three catchments, the River Welland, the Postland Pumped Catchment and South Holland Main Drain, with mitigation identified for each catchment where required. Flood modelling only overlaps within the breach extent of the River Welland; the Postland and South Holland Main Drain (SHMD) catchments do not overlap. Where the flood extents from multiple catchments overlap, the 0.1% AEP plus climate change event, and maximum flood level and associated mitigation from the worst catchment, in flood risk terms, is adopted as the worst case scenario to assess and apply mitigation, rather than combining mitigation requirements from multiple catchments. A summary of the worst case scenario across all three catchments, along with the mitigation provided, is provided in Table 5-8 of **ES Appendix 11-3 Flood Risk Assessment** [REP1-050]. As such, where catchments overlap, mitigation requirements from other catchments, where flood risk impacts are less, are superseded by that associated with the worst case scenario. For example, the mitigation required for the River Welland breach scenario in Land Parcel B supersedes any mitigation requirements arising from the SHMD model results (discussed in paragraph 5.3.103 of **ES Appendix 11-3 Flood Risk Assessment** [REP1-050]). This is due to the greater flood depths from the River Welland breach event in this Land Parcel. Similarly, for the 400kV Substation and BESS Compound, the River Welland breach event mitigation supersedes the mitigation required from the SHMD flood extents (paragraph 5.3.107 of **ES Appendix 11-3 Flood Risk Assessment** [REP1-050]. Similarly, in Land Parcel A, the mitigation required for the River Welland breach event also supersedes that identified for the Postland Pumped Catchment, as the River Welland breach event results in greater flood depths (paragraph 5.3.121 of **ES Appendix 11-3 Flood Risk Assessment** [REP1-050]).

ExQ1	Question to:	Question:
		The River Welland breach scenario represents a residual risk event associated with the failure of the River Welland flood defences associated with the Crowland and Cowbit Washes Flood Storage Area (a Statutory Reservoir under the Reservoirs Act 1975), which is required to be maintained and inspected by the Environment Agency, with a subsequent low risk of failure. Furthermore, it is considered unlikely that flood events of equivalent magnitude would occur simultaneously across all assessed catchments, as in normal operation the River Welland is defended. As such, the assessment adopts the reasonable worst case flood scenario from the individual catchment assessments, which is considered appropriate for identifying mitigation requirements.
Q19.0.11	The applicant	**Necessity of development in Flood Zone 3b** It is proposed to partially develop in Flood Zone 3b. NPS EN-1 states that energy projects should not normally be consented in Flood Zone 3b unless it is necessary for operational reasons. The applicant states in [REP1-050] that removing these land parcels would reduce the scheme's generating capacity and viability, and that the solar stations are 'necessarily situated within Flood Zone 3b'. Given the statement in NPS EN-1, confirm how a 'need' for 750MW was identified and provide more details of why removal of the works in Flood Zone 3b would result in an unviable scheme.
		The Applicant acknowledges that the term 'viability' was not intended to infer that the entire Scheme would be unviable should the area within Flood Zone 3b be removed. Instead the text was referring to reduced generating capacity, and the acknowledgment that should the generating infrastructure within that area be removed, this would undermine the Scheme aims to maximise the renewable energy generation from the land available relative to the connection offer. To avoid this unintended inference, the Applicant will update **ES Appendix 11-3: Flood Risk Assessment** [REP1-050] for Deadline 4 to clarify this. However, the Applicant still notes that Parcel D-1 generates approximately 32.2 MWac (equivalent to approximately 4.3% of the Scheme's total capacity), and as such, it is considered an important

ExQ1	Question to:	Question:
		part of the Scheme for maximising generating capacity. This capacity cannot be accommodated elsewhere within the Order Limits due to other design considerations and constraints as described within the **Design Approach Document** [APP-268]. Retention of this area should be viewed in the context of the urgent need for new low carbon energy infrastructure which is critical for decarbonising the power system and supporting energy resilience within the UK. As set out in **ES Appendix 11-3: Flood Risk Assessment** [REP1-050] and **Post ISH1 Note: Sequential and Exception Test** [REP2-018], the Applicant can demonstrate that the components within Flood Zone 3 will be safe for the lifetime of the Scheme and would not materially increase flood risk elsewhere.
Q19.0.12	South Holland Internal Drainage Board	**Crossings** The proposal would introduce more than 100 crossings within this drainage board district. The applicant has responded to concerns raised by SHIDB about the design of these in the SoCG [REP1-087]. Please can SHIDB confirm if: • In its opinion, whether the assessment now represents a 'reasonable worst-case'. • Whether sufficient mitigation is secured through the OCEMP [REP1-061]. • Whether the statement in ES Chapter 11 [REP1-020] that 'the least impacting design that is reasonably practicable will be installed' is sufficiently secured in the dDCO [REP1-006] and that this is sufficiently precise and enforceable. • Whether a commitment in Appendix 11.2 [REP1-046] to 're-use existing culverts where possible' is adequately secured via the Environmental Mitigation and Commitments Register [APP-272] and the Watercourse Crossing Schedule [REP1-026]. If not, what is required? • SHIDB is content that detailed design is done post-consent, given the proposed design principles set out in the OCEMP [REP1-061] and Design Parameters [REP1-055], the proposed protective provisions and requirement for approval by SHIDB.

ExQ1	Question to:	Question:
		• It is satisfied by the proposals for inspection and maintenance of the crossings during operation, as set out in the OOEMP [REP1-063].
Q19.0.13	Environment Agency	**Temporary Watercourse Crossings** The EA has raised concerns about the definition of 'temporary' and potential underestimation of the Water Framework Directive (WFD) impacts on geomorphology [REP2-010]. The applicant has updated ES Chapter 11 [REP1-020] to more clearly define the term and draws attention to the proposed mitigation in the OCEMP [REP1-061]. Please can the EA confirm if it is now content with this response? If not, please explain the concerns in more detail and set out what is required to address these.
Q19.0.14	The applicant Environment Agency	**Culvert design** The EA states that the use of pipe culverts should be restricted to those watercourses that are predominantly dry throughout the year. The applicant does not commit to this but has amended the OCEMP [REP1-061] to commit to clear span structures across permanently wet watercourses, 'where practicable and safe to do so, except where the crossing forms part of a public highway access point or where an alternative crossing solution is justified through the detailed design process', at which point the EA would be consulted. Is the EA content that these proposals address its original concerns, in particular the potential effects on fish? If not, why not?
		The EA's Deadline 2 submission [REP2-023] refers to the EA being content with the use of clear span crossings on permanently wet waterbodies/watercourses. However, the EA has requested the below additional measures to be incorporated within the OCEMP: • Where any over pumping of waterbodies/watercourses takes place, that pumps are fitted with 2mm aperture screens to protect European eel and fish.

ExQ1	Question to:	Question:
		• Where pre-construction fish surveys take place, should notable fish assemblages be found including European eel, then this should inform the design considerations, which may include changing a culvert option to a clear-span crossing option. • Any culverts, including those crossing bellmouths, in permanently wet waterbodies/watercourses should be designed so as to preserve the natural bedform of the waterbody/ watercourse, ensure fish passage is not impeded and where necessary provide fish easements within the culvert to enable fish passage. • Detailed design of any piped drainage outfalls to consider measures for the prevention of eels entering the piped outfalls. The **OCEMP** (Doc Ref. 7.10 Rev 3) has been updated for Deadline 3 to incorporate these measures.
Q19.0.15	South Holland Internal Drainage Board	**Access to watercourses** SHIDB has raised concerns about encroachment into the Board's access strips and interrupted watercourse access near proposed haul roads. The applicant has responded to these concerns in the SoCG [REP1-087]. Please can SHIDB confirm if protective provisions requiring alternative access are sufficient to assuage its concerns? If not, why not?
Q19.0.16	The applicant North Level District Internal Drainage Board	**Provision for the North Level District Internal Drainage Board** Should similar provisions be made for the North Level District Internal Drainage Board where its district overlaps the OL as those made for the SHIDB? If not, why not?
		The Applicant understands this question to be in relation to the protective provisions included at Part 3 of Schedule 13 of the **Draft DCO** (Doc Ref. 3.1 Rev 3) for the benefit of drainage authorities.

ExQ1	Question to:	Question:
		The Applicant notes that these provisions are general, applying to all drainage boards whose area overlaps with the Order Limits, and would therefore benefit the North Level District Internal Drainage Board to the extent applicable. The Applicant has sought to engage with both the North Level District Internal Drainage Board and South Holland Internal Drainage Board but has currently only received a substantive response from South Holland. Should the North Level District Internal Drainage Board have specific requirements for inclusion in protective provisions, the Applicant would happily consider these (including through the inclusion of bespoke protective provisions if appropriate).
Q19.0.17	Lincolnshire County Council (as the Lead Local Flood Authority) Environment Agency	**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?

ExQ1	Question to:	Question:
		• 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 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?

ExQ1	Question to:	Question:
Q19.0.18	Lincolnshire County Council (as the Lead Local Flood Authority) Environment Agency	**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. • 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?

ExQ1	Question to:	Question:
		• 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 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?
Q19.0.19	The applicant	**Outline Flood Emergency Response Plan** Please confirm the following in relation to the OFERP [REP2-005]: • That the emergency services have been consulted on and have agreed to the proposals, including the evacuation plan as required by paragraphs 5.8.34 and 5.8.36 of NPS EN-1. If so, please provide their responses. If not, please confirm if there is an intention to do so during the examination and, if not, why not. • Provide the details of how speed of onset and flood depth have been calculated. Explain how uncertainty in the input data is accounted for to ensure that the reasonable worst-case scenario is assessed, given the likely flexibility in the parameters. Please signpost details of velocity, hazard and duration and/ or provide these, as required by paragraph 5.8.15 of NPS EN-1. • Is it anticipated that every construction compound will contain a refuge? If not, if this potential uncertainty is material to the calculation of travel times, please signpost where this requirement is secured and how the travel times presented in [REP2-005] have been calculated to ensure that they represent a reasonable worst-case. • How has the fact that staff could be working anywhere within the OL, including on solar panels or along the grid connection area, been accounted for in the assessment? • What does 'floodwaters to reach the centre of land parcel A *within* 45 minutes mean'? How much sooner could the water arrive? What about the speed of onset elsewhere on parcel A?

ExQ1	Question to:	Question:
		• The lack of time of onset relating to flooding from the South Holland Main Drain due to the constraints of the model is noted. Consider whether there are other methods that could be used to estimate this and the other parameters required by NPS EN-1. • It is stated 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'. Where is this quantified and secured? If not secured, how can this approach be relied upon as mitigation? • Has an assessment of whether the welfare cabins themselves would withstand the onset of flood water been undertaken? As an example, the applicant has calculated that there would be a freeboard of 0.38m in a refuge in parcel A, assuming a typical cabin height of 2.5m. If so, please provide this. If not, explain why not. • It is noted that there would be a maximum of 855 construction staff on the site per day. Allowing for 16 people per cabin, a refuge capacity for 368 personnel would be catered for when all 23 illustrative compounds are available. Paragraph 3.7.4 states that 'if safe evacuation is not possible for all staff to the safe refuge cabins, personnel must follow the egress route for each Land Parcel'. Elsewhere the plan states that personnel will first be asked to reach an evacuation point but that where this is not possible, they should seek refuge. Explain this apparent contradiction. • It is stated at paragraph 3.7.7 that 'The evacuation procedure should be developed on site to ensure staff are directed to compounds so as not to overload one compound in particular'. How is this secured and enforced? • The egress routes all pass through areas illustrated as Flood Zones 2 and 3. Provide evidence that they will remain safe for the time required for staff to escape or provide figures to show how long the routes would remain safe for in the event of a flood event.
		Engagement on the Outline Flood Emergency Response Plan

ExQ1	Question to:	Question:
		Comments from emergency services have not been incorporated within the **Outline Flood Emergency Response Plan** (OFERP) [REP2-005] prior to its submission, due to the timescales involved with needing to submit the document. However, the Applicant understands that the Lincolnshire's County Council's Emergency Planning and Business Continuity team and the Environment Agency will submit comments on the **OFERP** [REP2-005] at Deadline 3, following which any comments received will be reviewed and the document can be updated and resubmitted at Deadline 4. The Environment Agency (EA) was consulted during a meeting held on 16th September 2026 and agreed the proposed approach of preparing evacuation routes for each land parcel in principle. As stated in Section 4 of the **OFERP** [REP2-005], a major flood incident may require a coordinated response from a range of organisations, including emergency services. In addition, Table 3-3 of the OFERP states that Site Managers should liaise with the emergency services, where appropriate, and provide instructions to personnel on Site during a flood event. The **OFERP** [REP2-005] will therefore be reviewed and updated, as necessary, following consultation with emergency services to ensure that all evacuation routes and emergency response procedures remain appropriate and up to date. <u>Details of how speed of onset and flood depth have been calculated</u> The Applicant commissioned model derived flood arrival times to support the **OFERP** [REP2-005]. The methodology was agreed with the EA and utilised the River Welland Breach (RWB), Postland Pump Catchment (PPC) and South Holland Main Drain (SHMD) hydraulic models, which define flood levels across Land Parcels A, B, C and D and inform the design of flood-sensitive infrastructure. Flood durations were extracted from these models at key locations across the Site. These were extracted from the post-development model runs for the RWB 0.1% AEP plus climate change event (at breach locations 1 and 4), the PPC 0.1% AEP plus climate change pump failure scenario, and the SHMD joint 0.1% AEP plus climate change pump failure scenario. These model scenarios represent extreme flood conditions, including the residual risk associated with a River Welland breach event,

ExQ1	Question to:	Question:
		and therefore provide a precautionary basis for assessing flood durations and informing the **OFERP** [REP2-005]. Flood arrival times were assessed using the estimates for overtopping, breach opening and flood arrival. Breach opening is defined as the time from the start of the flood event to the point at which the flood defence structurally fails and a breach occurs, allowing rapid flow into the floodplain. Overtopping is defined as the time from the start of the flood event to the point at which channel capacity is exceeded and floodwaters first breach channel banks or defences. For the River Welland event, overtopping is modelled to occur approximately 20 hours after the start of the flood event. Flood arrival times were then derived from the hydraulic model outputs at key locations across the Site, providing an indication of the time available between the start of the flood event and the point at which floodwaters reach each assessed location. In total, flood arrival times were assessed at seven locations across the Site, comprising one location within each of Land Parcels A and C, two locations within Land Parcel B (one location within the land parcel and one within the northern area of the land parcel), two locations within Land Parcel D (including the Gotts Catchment), and one location within the south of the Grid Connection Route (GCR). Flood arrival times are detailed within the **OFERP** [REP2-005] in Section 3.2. This section provides further explanation on the flood response times for each land parcel, as well as the evacuation plan. The FRA [REP1-050] provides further detail on mitigation measures and appropriate freeboard allowances, informed by the predicted flood depths from the results of the hydraulic modelling for each catchment. The assessment for flood durations utilised the hydraulic models that assisted the assessment for flood risk in the **FRA** [REP1-050]. For the River Welland Breach hydraulic model, the '2080s' epoch (2070 to 2125) for the higher central allowance was selected, which is +28%, to account for the design life of the Scheme, which is 40 years from its expected start of operation in 2033. It, therefore, accounts for the worst case scenario, across the entirety of the design lifetime of the Scheme. For the PPC a higher-end climate change allowance of 28% for the 2080s epoch was applied for the Welland Management Catchment, which the PPC falls within. For the SHMD, a

ExQ1	Question to:	Question:
		higher-end climate change allowance of 13% for the 2080s epoch was applied for the Nene Management Catchment. The higher-end climate change allowance for all three catchments represents a reasonable worst case scenario for future rainfall intensities and higher river flows, ensuring the potential impacts of higher climate change scenarios throughout the design life of the Scheme are appropriately assessed. In the absence of the flood arrival times for the SHMD, the **OFERP** [REP2-005] contains the evacuation emergency plan actions for each flood warning, set out in Table 3-3, ensuring personnel can respond to the warnings effectively and safely evacuate the site for the Gotts Catchment, or make their way into the construction compounds within Land Parcel D, prior to flooding being expected. This approach is considered appropriate to address the uncertainties arising from the limited availability of flood arrival times for the SHMD. The South East Lincolnshire Local Plan Strategic Flood Risk Assessment (SFRA) Appendix A[19] was reviewed to identify the residual flood hazard maps associated with the Site. The hazard mapping includes impacts of climate change to 2115.Residual flood hazard is categorised into four bands in the map. Hazard ratings, based on the hazard ratings derived in the Defra / Environment Agency Flood and Coastal Defence R&D Programme Flood Risk Assessment Guidance for New Development Technical Note (FD2321, 2006)[20], of less than 0.75 represent a low hazard. Ratings between 0.75 and 1.25 indicate a danger for some people, ratings between 1.25 and 2.0 indicate a danger for most people, and ratings greater than 2.0 indicate a danger for all people.

[19] South East Lincolnshire Joint Strategic Planning Committee (2017) South East Lincolnshire Strategic Flood Risk Assessment, Appendix A. Available at: https://southeastlincslocalplan.org/media/23932/Residual-Flood-Hazard-South-Holland-District-2115-1-fluvial-0-5-tidal/pdf/Residual_Flood_Hazard_District_2115_1_Fluvial_05_Tidal_20170224-1.pdf?m=1703944979257

[20] Defra / Environment Agency Flood and Coastal Defence R&D Programme Flood Risks to People (FD2321): https://assets.publishing.service.gov.uk/media/602bbc3de90e07055f646148/Flood_risks_to_people_-_Phase_2_Guidance_Document_Technical_report.pdf

ExQ1	Question to:	Question:
		The South Holland District 2115 Residual Flood Hazard Map for the 1% fluvial event and 0.5% AEP tidal event shows that the majority of Land Parcel A is located within areas of hazard greater than 2.0, with limited areas within the 1.25-2.0 flood hazard band. Land Parcel B is predominantly located within the 1.25-2.0 hazard band. Within Land Parcel C, the western extent of the land parcel falls within the 0.75-1.25 hazard band, whilst the eastern extent doesn't lie within any flood hazard. Land Parcel D is not affected by any of the mapped residual flood hazards. In relation to the proposed egress routes, the egress route for Land Parcel A and the north of Land Parcel B are located within hazards of between 1.25 and 2.0. The egress routes for Land Parcel B and C are located largely outside of residual flood hazards, with the egress route inside the land parcels located within hazard of less than 0.75, and therefore low hazard. The egress routes for the Inter Connection Area between Land Parcel C and D, and that of Land Parcel D are located outside of any residual flood hazards. The northern area of the GCR is largely located within a flood hazard between 1.25 and 2.0, with small areas located within a flood hazard of 0.75 and 1.25. The egress routes associated with the northern most construction compound and the construction compound in the middle of the GCR are located outside of any residual flood hazards. The egress route associated with the southern construction compound within the GCR is mostly located outside of any residual flood hazards, with a small area located within a hazard rating between 0.75 and 1.25. Although sections of the proposed egress routes pass through areas identified as having high residual flood hazard rating, the hazard mapping represents a residual risk associated with flooding of the River Welland. This risk is considered to be highly unlikely, as the River Welland defences provide protection for the 0.1% AEP plus 28% climate change event. Evacuation would be undertaken in advance of flooding on site, following receipt of appropriate flood warnings and following procedures set out in the **OFERP** [REP2-005]. As such, personnel would not be expected to travel through floodwaters, and the proposed routes are therefore considered suitable for

ExQ1	Question to:	Question:
		emergency evacuation. The **OFERP** [REP2-005] will be updated to provide these details in Deadline 4. The Applicant will also update the **OFERP** [REP2-005] at Deadline 4 to include an assessment of potential flood durations, so that appropriate supplies (such as food, water, welfare and first aid provisions) are in place to support safe refuge for site personnel for the full period they may be required to shelter. <u>Refuges at construction compounds</u> Paragraph 5.3.139 in the **ES Appendix 11-3 Flood Risk Assessment** [REP1-050] states that there will be requirements for the provision of safe refuge at the temporary construction compounds. Paragraph 5.3.141 up to paragraph 5.3.154 in the **FRA** [REP1-050] provides detailed information of the safe refuge of each construction compound located within Land Parcels A, B, C, and D that are located within fluvial flood risk extents. Safe refuge will be provided by locating a welfare cabin, either raised on a platform or stacked on top of the ground floor unit, with safe refuge levels set above the River Welland breach event. Paragraphs 5.4.8 up to 5.4.13 in the **FRA** [REP1-050] provides information of safe refuge of the construction compounds located within the GCR. Three of these compound locations are located in the Flood Zone 2 and 3 flood extents for Rivers and Sea, and therefore safe refuge will be provided at the compound by locating a welfare cabin, either raised on a platform or stacked on top of the ground floor unit, above a maximum flood depth of approximately 2m at this location, using the assumption that the River Welland breach model extends to the GCR. Table 3-1 of the OFERP provides a summary of the safe refuge levels and freeboard above maximum flood levels of the construction compounds in each land parcel. Section 3.5 of the **OFERP** [REP2-005] also provides grid references to each safe refuge construction compound. In summary, each temporary construction compound will contain safe refuge. These refuge areas have been designed with sufficient freeboard above the maximum modelled flood levels associated with the worst-case flood event. The provision of safe refuge at construction

ExQ1	Question to:	Question:
		compounds is secured through the requirements set out within the **OCEMP** (Doc Ref. 7.10 Rev 3) and the **OFERP** [REP2-005]. <u>Egress routes within the Order Limits</u> The **OFERP** [REP2-005] identifies designated egress routes for each land parcel to ensure the safe evacuation of personnel to the designated evacuation point during an emergency. During a meeting with the EA on 16th September 2026, it was agreed that egress routes should be developed per land parcel. Figure 1: Egress Route Grid Connection Route and Figure 2: Egress Route SDA, presented within Appendix 1 of the OFERP, illustrate the evacuation routes for all land parcels and the GCR, including routes from access routes within the land parcels to the designated evacuation routes. Paragraph 3.8.5 of the **OFERP** [REP2-005] states that consideration should be given to the surrounding road network and that evacuation routes should be clearly signposted to ensure all personnel are aware of the appropriate route to follow. The OFERP further states that all staff should be aware of the designated meeting point in the event of a flood, the relevant egress route for their working area, and the designated evacuation point. During an evacuation, staff will assemble at designated locations within the land parcels, on Site before evacuating via vehicle. All personnel will therefore be familiar with the designated meeting point, egress route and evacuation point relevant to their working area, regardless of where they are working within the Order Limits. In the event of an evacuation, personnel would proceed to the designated meeting point, where they would be accounted for before evacuating the Site via vehicle using the identified egress route. The Site Manager is responsible for ensuring all personnel are accounted for, confirming that evacuation routes remain safe and accessible, directing personnel to the appropriate safe refuge area or evacuation point, and suspending non-essential activities until the flood risk has passed. The Site Manager should also liaise with emergency services and provide instructions to personnel during a flood event.

ExQ1	Question to:	Question:
		In summary, signage will be provided within temporary construction compounds and across the Site to direct personnel to the appropriate safe refuge location if safe evacuation from the Site is not possible. All personnel will be made aware of the access and egress routes applicable to their work area, together with the designated evacuation point, enabling staff working throughout the Order Limits to safely evacuate by vehicle. Land Parcel A breach event Further assessment was undertaken to provide model derived flood arrival time estimates in support of the **OFERP** [REP2-005]. The assessment quantifies three key flood timing thresholds across locations within the Scheme. Initial Overtopping Time is the time from the start of the flood event to the point at which channel capacity is exceeded and floodwaters first breach channel banks or defences. Time of Breach Opening is the time from the start of the flood event to the point at which the flood defence structurally fails and there is a breach, allowing rapid flow into the floodplain. Flood Arrival Time is the time from the start of the flood event or time of breach to the time at which floodwaters reach specified location within the Order Limits. All reported thresholds are measured relative to T = 0.00 hours, which represents the commencement of the design event. Land Parcel A was assessed using 0.1% AEP plus climate change event at breach location 1 of the River Welland Breach event. The results of the assessment conclude that the overtopping of defences occurs late in the design event simulations, 40.00 hours for Breach 1. As set out within the **OFERP** [REP2-005], the Site would be evacuated upon a Flood Alert warning, meaning personnel would be expected to have already evacuated the Site prior to the occurrence of a breach event. The 45 minute flood arrival time following a breach relates to the assessment location selected within the centre of Land Parcel A. This location was selected as it is associated with the nearest construction compound to the River Welland and the start of the route from the site access routes to the evacuation route, and was therefore considered an appropriate location to use for the assessment. The 45 minute period represents the time taken for floodwaters to propagate from the

ExQ1	Question to:	Question:
		breach location to this representative point within Land Parcel A. Therefore, the 45 minute flood arrival time provides an additional contingency period within which any remaining personnel could evacuate the Site by car, notwithstanding that the **OFERP** [REP2-005] assumes personnel would already have evacuated the Site in response to the previous flood warning. It is important to note that the 45 minute flood arrival time is during a breach event, which is highly unlikely, as the River Welland defences provide protection for the 0.1% AEP plus 28% climate change event. In normal operation the risk is a low residual risk. South Holland Main Drain modelling limitations The Applicant acknowledges that flood arrival times are not available for flooding associated with the SHMD due to the model being 1D only. The SHMD has been assessed using the hydraulic modelling undertaken for the **FRA** [REP1-050], which represents the 0.1% AEP plus climate change pump failure scenario and provides the basis for assessing flood extents and flood levels across the catchment. No additional modelling has been undertaken to derive flood arrival times for this catchment. Given the low-lying and relatively flat nature of the catchment and surrounding floodplain, as concluded within the **FRA** [REP1-050] paragraph 5.3.91, flooding associated with the SHMD is not expected to be characterised by rapidly developing flow paths. The flood extents and flood depths of the SHMD obtained through the hydraulic model have been used to inform safe refuge of the construction compounds and the egress routes within Land Parcel D. Whilst flood arrival times are not available for this catchment, personnel would be alerted through the EA Flood Warning Service and respond in accordance with the evacuation emergency plan actions set out in Table 3-3 of the **OFERP** [REP2-005]. This approach is considered appropriate to inform the **OFERP** [REP2-005] and ensure personnel can safely evacuate Land Parcel D prior to flooding being expected.

ExQ1	Question to:	Question:
		The **OFERP** [REP2-005] has therefore set out the detailed evacuation plan, using the EA flood warnings and the evacuation emergency plan actions associated with each flood warning, enabling personnel to safely evacuate Land Parcel D, where necessary, prior to flooding being expected. <u>Flood warnings</u> The **OFERP** [REP2-005] details the evacuation emergency plan actions for each flood warning, including Met Office weather warnings and the EA flood warnings, within Table 3-3. The Met Office weather warnings include warnings of heavy rainfall and warnings of severe winter weather. The table details that staff should regularly check for any Met Office weather warnings. Depending on the severity of the weather warnings, Site Managers/ Duty Managers would consider postponing non-essential site activities and restricting access to the Site to minimise potential risks to site personnel should forecast conditions become more severe. Implementation of these measures would reduce the number of personnel undertaking non-essential activities during periods of severe weather. With regards to the EA flood warnings, the table details that during a Flood Warning, staff are required to begin evacuating the Site, regardless of whether staff are located within a defended breach area or undefended flood extent area. During this flood warning, the Site Manager and designated team leads will alert all site workers of the flood warning immediately and arrange evacuation via the egress route. The EA Flood Warning is used when flooding is expected, and therefore immediate action is required. The Undertaker of the Scheme and its Contractors must sign up to the EA's Flood Warning Service, and therefore will receive any flood warnings. It is the duty of the Site Manager to instruct the staff on when access to the Site should be restricted, non-essential activities should be postponed, and when evacuation of the Site should commence in accordance with the procedures set out within the **OFERP** [REP2-005].

ExQ1	Question to:	Question:
		Therefore, Table 3-3 of the **OFERP** [REP2-005] establishes the procedures to be followed in response to Met Office weather warnings and EA Flood Warnings, including the postponement of non-essential activities and restriction of Site access by Site Managers/Duty Managers. Implementation of these measures would reduce the number of staff present on Site during periods of forecast heavy rainfall and forms part of the evacuation emergency plan actions set out within the **OFERP** [REP2-005]. Welfare cabins The modelling used to assess the flood durations within the **OFERP** [REP2-005] uses the same hydraulic modelling that informed the **FRA** [REP1-050]. The modelling methodology, which was agreed with the EA, was undertaken to define the flood levels for Land Parcels A, B, C and D to inform the elevation of flood-sensitive infrastructure. The safe refuge levels for the proposed welfare cabins were determined using the flood depths of these models, with refuge levels set above the maximum modelled flood levels for the worst case scenario, which was the River Welland Breach event 0.1% AEP plus climate change flood extent for Land Parcels A, B, C and the GCR, and the SHMD 1% AEP plus 13% climate change scenario for Land Parcel D, and incorporating an appropriate freeboard allowance. Table 3-1 of the **OFERP** [REP2-005] provides the minimum freeboard above maximum flood levels. The assessment therefore demonstrates that the proposed welfare cabins would provide a safe refuge above the modelled flood levels associated with the onset of flooding during the events detailed above. No temporary construction compounds will be located within the flood extents of 1% AEP + 28% climate change of the Postland Catchment and 1% AEP + 13% climate change South Holland Main Drain Catchment (with the exception of the Gotts catchment) in accordance with the **OCEMP** (Doc Ref. 7.10 Rev 3). Egress routes

ExQ1	Question to:	Question:
		The Applicant acknowledges this inconsistency within the **OFERP** [REP2-005]. Personnel are expected to first evacuate the Site via the identified egress routes and proceed to the designated evacuation point, as shown in Figure 1: Egress Route Grid Connection Route and Figure 2: Egress Route SDA located in Appendix A of the **OFERP** [REP2-005]. As set out in Table 3-3 of the **OFERP** [REP2-005], at the EA Severe Flood Warning stage, the Site should already have been evacuated during the previous flood warning stage. However, where this has not been possible, any remaining staff should proceed to the nearest temporary construction compound, which would provide safe refuge. The construction compounds have been designed with sufficient freeboard above the predicted flood levels associated with the worst-case flood event, which was the River Welland Breach event 0.1% AEP plus climate change flood extent for Land Parcels A, B, C and the GCR, and the SHMD 1% AEP plus 13% climate change scenario for Land Parcel D. The **OFERP** [REP2-005] will be updated at Deadline 4 to clarify this approach and ensure that the evacuation plan is described consistently throughout. Notwithstanding the above, construction compounds within Land Parcel D are located outside of the flood extent and, as such, personnel within this land parcel would continue to follow the identified egress routes to the construction compounds as set out within the **OFERP** [REP2-005] (not including the Gotts Catchment). <u>Capacity at compounds</u> The **OFERP** [REP2-005] would be owned, maintained and updated by the Undertaker of the Scheme and is subject to periodic review in accordance with Section 5 of the OFERP. Paragraph 3.7.4 of the **OFERP** [REP2-005] states that the available safe refuge capacity of 368 personnel is considered appropriate for any staff remaining on Site during a flood event. Paragraph 3.7.4 also confirms that the Site Manager is responsible for monitoring EA flood warnings, Met Office forecasts and site conditions and, in the event of a flood warning, assessing whether all personnel can be safely evacuated from the Site.

ExQ1	Question to:	Question:
		Where safe evacuation is not possible, personnel would be directed to the identified safe refuge locations. Paragraph 3.7.9 of the **OFERP** [REP2-005] states that where the number of personnel on Site exceeds the available safe refuge capacity, remaining personnel would follow the identified evacuation routes to areas outside of the Scheme and outside of the flood extent. Paragraph 3.7.9 also states that, during periods of forecast heavy rainfall, there would be a reduced number of personnel on Site during the replacement of Scheme infrastructure, such that the available safe refuge provision remains appropriate. Accordingly, implementation of the evacuation procedure, including the allocation of personnel between refuge compounds and evacuation routes, would be managed by the Site Manager to ensure that no individual refuge compound becomes overloaded. The **OFERP** [REP2-005] details the time it takes for floodwaters to propagate to Land Parcels A, B and C in the event of a breach opening of the River Welland, and for floodwaters to reach Land Parcel A, B and C from overtopping of the Postland Catchment. In the event of a breach opening of the River Welland, the modelled flood arrival time is 45 minutes for Land Parcel A and the northern extent of Land Parcel B, and 8.25 hours for Land Parcel C. In the event of overtopping from the Postland Catchment, the modelled flood arrival times are 57.82 hours (approximately 2.4 days) for Land Parcel A, and 57 hours (approximately 2.4 days) for Land Parcel B, which also represents the worst case scenario for Land Parcel C. It should be noted that the flood arrival time recorded for Land Parcel C is 1.83 hours (approximately 1 hour and 50 minutes). However, this relatively short duration is considered to be a result of the assessed location being situated immediately adjacent to a watercourse (within 3m), and, therefore, the modelled onset flooding grid (which is a 16m grid) is likely associated with rising watercourse levels. As no infrastructure is proposed within this location, it is expected that staff will not be working in this area of early onset flood risk. Therefore, the flood arrival time recorded for Land Parcel B has been taken as the worst case scenario for Land Parcel C, providing an appropriate assessment for the land parcel. For Land Parcel A, the time taken for floodwaters to reach the land parcel is 45 minutes.

ExQ1	Question to:	Question:
		As detailed in Table 3-4 within the **OFERP** [REP2-005], the maximum drive time for the evacuation routes using the road network within the SDA is 13 minutes, from the northern extent of Land Parcel B, where floodwaters are also predicted to arrive within 45 minutes. The available flood arrival time therefore exceeds the maximum evacuation drive time by approximately 32 minutes, providing sufficient time for personnel to leave the Site by vehicle before floodwaters are expected to affect the access and egress routes. As the maximum evacuation drive time is substantially shorter than the earliest modelled flood arrival time, which is for Land Parcel A, and north of Land Parcel B, from the opening of a breach of the River Welland, evacuation can be completed before floodwaters are expected to affect the egress routes. The modelled flood arrival times therefore indicate that the routes remain available for a sufficient period to enable personnel to safely leave the Site. This is considered to provide an appropriate duration for personnel to evacuate the Site via vehicle before floodwaters propagate further across the Site and into the proposed egress routes. Therefore, the modelled flood arrival times for both the River Welland breach and Postland Catchment overtopping events for the SDA exceed the maximum evacuation drive time of 13 minutes within the SDA, demonstrating that the egress routes remain available for a sufficient period to enable the safe evacuation of personnel from the Site. <u>Egress routes within Flood Zones 2 and 3</u> For the GCR, the flood risk assessment has been informed by Flood Zones 2 and 3 obtained from the Flood Map for Planning and, therefore, flood arrival times are not available. As detailed in Table 3-4 of the **OFERP** [REP2-005], the maximum drive time from the GCR to the identified evacuation point is approximately 5 minutes. The **OFERP** [REP2-005] incorporates advance warning through the EA Flood Warnings and Met Office weather warnings, allowing personnel to leave the working area prior to flooding being expected. In addition, the **OFERP** [REP2-005] requires Site Managers to verify that evacuation routes remain unobstructed and safe for use. Given the short evacuation travel time of approximately 5 minutes, together with the use of flood warnings, personnel are

ExQ1	Question to:	Question:
		expected to be able to safely reach the identified evacuation point before flooding affects access and egress routes. Table 3-3 of the **OFERP** [REP2-005] states that, at the Flood Alert stage, staff must ensure that all designated escape routes are kept clear and that access and egress routes, including all site gates, remain unobstructed. It is the responsibility of the Site Manager to confirm that evacuation routes remain safe and accessible. Furthermore, the **OFERP** [REP2-005] incorporates advance warning through the EA Flood Warnings and the Met Office weather warnings, allowing sufficient time for personnel to evacuate the Site prior to flooding. Therefore, the egress routes are intended to be used during the period between the issue of a flood warning and the onset of flooding, ensuring sufficient time is available for personnel to safely evacuate the Site.
Q19.0.20	The applicant	**Location of compounds during operation** • Provide a clear explanation of how each compound for the operational phase listed in paragraph 3.1.16 [REP2-005] has been located to meet the requirements of the sequential approach. • Explain how workers would be kept safe from flooding during the operational phase, including assessment of travel times to the place of refuge or evacuation points and the fact that there would not be sufficient refuge capacity for the 98 personnel expected during periods when infrastructure is being replaced. • 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. How would it be ensured that this mitigation measure can be relied upon over a period of 40 years? • Where has the timing of the gates needing to be shut been considered in the risk assessment? If it has not been, please provide this information or justify why not.
		<u>Application of the Sequential Test for compounds</u>

ExQ1	Question to:	Question:
		Other than fluvial and tidal risk, **ES Appendix 11-3 Flood Risk Assessment** [REP1-050] has appropriately assessed the flood risk across the Scheme from all other flood risk sources as low; therefore, other than fluvial and tidal risk, siting of infrastructure within the Scheme, when taking into account other sources of flood risk, satisfies the sequential approach. The sequential approach of siting of infrastructure is thus dominated by fluvial and tidal risk. The on-site 132kV substations and the 400kV Substation and BESS are the locations of the office compound locations during the operational phase of the Scheme. Work Number 3B on the **Works Plans** [APP-009] provides the locations for the on-site132kV substations within the Solar Development Area (SDA), within Land Parcels A, C and D. Work numbers 2 and 3A on the **Works Plans** [APP-009], provide the location of the 400kV Substation and BESS Compound in Land Parcel B. Annex D of **ES Appendix 11-4 Outline Surface Water Drainage Strategy** [APP-231] indicates the proposed illustrative electrical infrastructure locations and modelled floodplain extents, confirming the operational compounds in the 132kV substations in Land Parcels C and D are not within modelled extents; combined with low risk of flooding from all other sources, these two compounds satisfy the sequential approach. <u>Land Parcel A</u> The operational compound in Land Parcel A is located within the 132kV substation. The location has been selected outside of the undefended 0.1% AEP plus 28% climate change extent, i.e. in Flood Zone 1, associated with the Postland Pumped catchment. It is not within the flood extent of the South Holland Main Drain. The River Welland is defended up to the 0.1% AEP event including 28% climate change, presenting a low risk residual breach extent of the River Welland extends across Land Parcel A. The operational compound must be co-located with the 132kV substation because it contains the equipment and facilities required for the operation, monitoring and maintenance of the electrical

ExQ1	Question to:	Question:
		infrastructure. The substation itself must be positioned to collect electricity generated across the Solar Development Area and connect efficiently to the 400kV Substation and BESS network infrastructure, thereby minimising cable routes and associated environmental impacts. There are no reasonable available alternative locations within Land Parcel A that would meet both the operational requirements of the 132 kV substation and be located in an areas of lower flood risk. Accordingly, the operational compound has been located in the lowest reasonably available flood risk location compatible with the operational requirements of the Scheme and therefore accords with the principles of the sequential approach. Land Parcel B Land Parcels B-5 and D-1 were originally considered as the only suitable locations of the 400kV Substation, as discussed in **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. Table 3-6 of **ES Chapter 3: Alternatives and Design Evolution** [APP-054] discussed flood modelling, indicating Parcel D-1 is within Flood Zone 3b. The 400kV Substation was, therefore, selected in Land Parcel B-5, as it was in the lowest area of flood risk that the 400kV Substation could be located. The operational compound within the 400kV Substation and BESS Compound is located within the 0.1% AEP plus 28% climate change extent during the low residual risk of a pump failure scenario of the SHMD, and the low residual breach extents of the River Welland. The operational compound must be located within the 400kV Substation and BESS site because it houses the control, monitoring and welfare facilities needed to supervise high-voltage equipment and battery storage. Operators would need to be able to reach the plant in a short space of time to isolate equipment and respond to alarms. Co-location also allows shared use of site security, fire detection and emergency systems, and avoids the additional land take and access infrastructure of a second site. A remote location is, therefore, not considered a safer or operationally practicable alternative. There is no other location at lower fluvial or tidal risk to locate this infrastructure; an alternative site would

ExQ1	Question to:	Question:
		be at a distance to necessitate longer overhead lines, more underground cabling and could cause significant environmental impacts. Given the flood risk is a low residual fluvial and tidal risk, and at low risk from all other sources of flood risk and cannot reasonably be located in an area at lower risk, it is considered the siting of the 400kV Substation and BESS, within the bounds of the Order Limits, has duly applied the Sequential approach. <u>Land Parcels C & D</u> The 132kV substations containing the operational compounds in Land Parcels C & D are outside all modelled fluvial and tidal extents, and at low risk from all other courses of flood risk; therefore, these locations satisfy the sequential approach. However, the 132kV substation in Land Parcel C abuts the worst case flood risk extents of the River Welland Breach, it has been bunded to provide a cautionary approach to flood risk, to a height of 2.5m, as set out in Table 5-5 of **ES Appendix 11-3 Flood Risk Assessment** [REP1-050]. The 132kV substation in Land Parcel C was previously located in Land Parcel B, but was moved in response to hydraulic modelling outputs which showed that it was located within the River Welland breach extents. <u>How workers would be kept safe from flooding</u> The **Outline Flood Emergency Response Plan** (oFERP) [REP2-005] sets out that staff will be instructed to leave the site on receipt of a flood warning, as set out in Table 3-3 of the **oFERP** [REP2-005]. It is, therefore, reasonable to expect that the Site will be empty or nearly empty before floodwaters could affect the safety of workers. Safe refuge is provided within raised cabins within the operational phase compounds. Section 3.2 of the **oFERP** [REP2-005] sets out the flood inundation response times for flood water to reach the Site. Land Parcel A notes the shortest inundation response time of 45 minutes, for the River Welland; however, it is defended by the River Welland flood defences. It is important to note

ExQ1	Question to:	Question:
		that the 45 minute response time is during an overtopping event, which is highly unlikely, as the defence provide protection for the 0.1% AEP plus 28% climate change event. In normal operation the risk is a low residual risk. Following the evacuation procedures set in in Table 3-3 of the **oFERP** [REP2-005], the Site will have been evacuated before the River Welland overtopping event occurs. Time to travel to safe refuge is set out in Table 3-4 of the **oFERP** [REP2-005] with drive times to safe refuge ranging from 6 minutes to 13 minutes across the Solar Development Area. The longest drive time is less than a third of the shortest inundation time. Therefore, it is considered there is sufficient time to leave site or reach safe refuge if safe escape off site is not possible. The **oFERP** [REP2-005] notes evacuation is to be undertaken by vehicle, in paragraph 3.7.11. Regarding sufficient space for staff in the operational phase of the Scheme during planned maintenance, it is expected reduced staff will be on site during heavy rainfall events. This is supported by the nature of the work itself. Routine maintenance of solar infrastructure involves energised electrical equipment, and the risks of electric shock, slips and lightning strike increase in wet conditions. Planned and non-essential maintenance would not normally be undertaken during heavy rainfall or severe weather, so staff numbers on site during a storm would be expected to be minimal in any event. In the unlikely event that any personnel remain on site in a flood event, the safe refuge is located above all modelled flood extents for the lifetime of the Scheme and remains flood-free and it is considered there is sufficient space to accommodate a minimal number of staff on site, providing a safe refuge capacity of up to 48 staff. <u>Suitability of flood protection measures over the lifetime of the Scheme</u> The safe refuges provided within construction and operational compounds are raised either in containers raised on a platform or on top of office buildings in the compounds, providing at least 0.3m freeboard above the maximum predicted flood level, for the worst case flood extent for each

ExQ1	Question to:	Question:
		Land Parcel they sit within. They do not rely on Scheme flood mitigation, i.e. flood bunds or walls, or gates, to remain safe and dry during a flood, in the event of a failure of the mitigation in place. Regarding safe refuge in the operational phase being available for the life of the Scheme, Table 5-8 of **ES Appendix 11-3 Flood Risk Assessment** [REP1-050] sets out the worst case flood extent for each Land Parcel. The predicted flood depths to assess safe refuge across the Solar Development Areas have been used the worst-case maximum depth, in each Land Parcel of: • Defended River Welland Breach: i.e. the 0.1% AEP plus 28% climate change; or • Postland Pumped Catchment: 1% AEP + 28% climate change; or • South Holland Main Drain Catchment: 1% AEP + 13% climate change. For operational compounds in flood risk areas in Land Parcel A and B, the safe refuge is provided for the Welland breach event, the 0.1% AEP plus climate change, ensuring the proposed safe refuge levels will not be impacted for the lifetime of the Scheme. The operational compounds in the 132kV substation in Land Parcels C and Parcel D are not impacted by fluvial or tidal flooding. However, as noted above, the 132kV substation in Land Parcel C abuts the worst case flood risk extents it has been bunded to provide a cautionary approach to flood risk, to a height of 2.5m, as set out in Table 5-5 of **ES Appendix 11-3 Flood Risk Assessment** [REP1-050]. Annex E of **ES Appendix 11-3 Flood Risk Assessment** [REP1-052] provides an assessment of the H++ sea level rise impacts across Land Parcels A, B, C and D, concluding the proposed embedded mitigation for the Scheme, as set out in **ES Appendix 11-3 Flood Risk Assessment** [REP1-050], is sufficient, with no further mitigation needed. As, such safe refuge levels are still suitable and do not need to be raised further. Therefore, it is considered the safe refuge for the 40 year design life of the Scheme is appropriately assessed and secured, remaining safe at all times. <u>Timing of gate closures</u>

ExQ1	Question to:	Question:
		The timing of gate closures has not been assessed because the safe refuge does not rely on it, either during construction, operation, or decommissioning, as such they are not a material consideration when providing minimum levels for safe refuge. The safe refuge provided for operational compounds in the 400kV Substation and BESS, and the 132kV substations, is located above modelled flood extents with 0.3m freeboard as a minimum. It therefore remains flood-free whether the gates are closed or not for the lifetime of the scheme; there is no scenario in which the safe refuge is compromised by the gates being left open. It would be expected that the gates are closed under normal site management. The Site Manager would be expected to close them on receipt of a flood warning, and they would normally be closed at the end of each working day. This would restrict access to the area during and after an event, reducing the likelihood of people or vehicles entering flood-prone land while it is inundated. Because these measures are procedural and secondary to the refuge's elevated position, they provide an additional layer of resilience without being relied upon to deliver safe refuge. This approach is proportionate to the risk: it avoids placing a safety-critical dependency on human intervention where the design already removes the hazard. The **oFERP** [REP2-005] will be updated at Deadline 4 to clarify the discussion, as safe refuge is to be provided, raised above ground, at all construction and operational compounds.
Q19.0.21	The applicant	**Historical information on previous flood events** Paragraph 5.8.15 of NPS EN1 states that a FRA should be supported by historical information on previous events. Notwithstanding the statement on sewer flooding in the FRA [REP1-050], please signpost where this information can be found. If not, provide this information.

ExQ1	Question to:	Question:
		The Applicant reviewed the Joint Lincolnshire Flood Risk and Water Management Strategy 2019-2050[21]and the South East Lincolnshire Strategic Flood Risk Assessment, 2017 (SFRA)[22], when preparing **ES Appendix 11-3: Flood Risk Assessment** [REP1-050]. Neither document identifies a history of sewer flooding within the Order Limits. The Lincolnshire County Council Preliminary Flood Risk Assessment[23], 2011 (PFRA) provides a flood history across Lincolnshire, including South Holland District. The PFRA was consulted in preparing **ES Appendix 11-3: Flood Risk Assessment** [REP1-050]. Maps in the PFRA: "*Boston and South Holland FR&DMG - Recorded incidents of historical local flooding*" (Page 61) and "*Boston and South Holland FR&DMG - Initial areas where potential flood risk requires further investigation as part of the local strategy*" (Page 63) indicate past recorded flood events and areas at risk of local flooding. None of the areas identified are within the Order Limits. The flooding recorded can be attributed to any source although it is not specified in the PFRA. As no historic flooded area is within the order limits, it is considered there are no published historic flooding events recorded across the Order Limits. Lincolnshire County Council also publishes information regarding Section 19[24] flood investigations[25]. For South Holland District Council, there have been 12 investigations of flooding to properties between 2023 and 2026. The information does not state the precise locations of the incidents; however, the nearest listed settlement for an investigation is at the town of Spalding. On the basis

[21] Lincolnshire Flood Risk and Water Management Partnership (2019) Joint Lincolnshire Flood Risk and Water Management Strategy 2019-2050. Available at: https://www.lincolnshire.gov.uk/downloads/file/2365/joint-lincolnshire-flood-risk-and-water-management-partnership-framework-draft-strategy-2019-2050-pdfa.
[22] South East Lincolnshire SFRA, 2017: https://southeastlincslocalplan.org/media/23906/South-East-Lincolnshire-Strategic-Flood-Risk-Assessment/pdf/SE-Lincolnshire-SFRA-2017-v6-24th-Jan-2018.pdf?m=1703944317647 [Accessed 22/10/2026]
[23] Lincolnshire PFRA< 2011, https://www.lincolnshire.gov.uk/downloads/file/4382/preliminary-flood-risk-assessment-report [Accessed 22/10/2026]
[24] Flood and Water Management Act 2010, Section 19 Investigations: https://www.legislation.gov.uk/ukpga/2010/29/section/19 [Accessed 22/10/2026]
[25] Lincolnshire County Council Section 19 investigations: https://www.lincolnshire.gov.uk/flood-risk-management/flood-investigations [Accessed 22/10/2026]

ExQ1	Question to:	Question:
		of the information reviewed, no recorded history of sewer flooding has been identified within the Order Limits. Further, the Scheme would not utilise public sewers to drain surface water runoff or foul water. with the Applicant therefore considers the conclusion in **ES Appendix 11-3 Flood Risk Assessment** [REP1-050] that the risk of sewer flooding is low remains valid.
Q19.0.22	Lincolnshire County Council South Holland Internal Drainage Board North Levels Internal Drainage Board Environment Agency	**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?
Q19.0.23	The applicant	**Subsurface drainage pathways** It is proposed that thousands of poles would be driven into the ground (for example in [REP1-055]), in addition to installation of concrete foundations. Please signpost where the potential effects on subsurface drainage pathways are considered. Provide a clear assessment of whether any effects could be adverse and significant, and, if so, identify where any mitigation is proposed to counter the adverse effects. It is noted that the below-ground infrastructure would be removed to a depth agreed with the landowner during decommissioning [REP1-074]. If there is an adverse effect on subsurface drainage from the piles and foundations, explain how this proposal ensures the site is left in a satisfactory state.

ExQ1	Question to:	Question:
		The Applicant considers that effects on subsurface land drainage will be neither adverse nor significant. Where existing subsurface land drains are encountered during construction, they will be repaired or diverted so that their function is maintained. Piles are small in cross-section and widely spaced, so the potential for interference with drainage pathways is limited, and any drains that are damaged will be reinstated. Pile positions can be micro-sited within the solar panel fields to avoid drains where practicable. Piles also have a narrow cross-section (typically around 9cm^2 to 40cm^2 per pile), so the total footprint is a very small proportion of the Site area. The British Research Establishment report: Agricultural Good Practice Guidance for Solar Farms, 2014[26] notes solar panel module piles typically occupy approximately 5% of the total ground area; therefore, the risk of interfering with below ground land drainage is considered to be low. Field drains typically sit at around 0.6-1.2 m depth and are linear, repairable features. Table 2-1 of **ES Chapter 2: The Scheme** [AS-017] notes foundations used for solar panels, if used, would be no more than 0.3m below ground; therefore, even with a slight overdig, the field drainage would not be materially impacted by concrete foundations for solar panel infrastructure. Concrete slabs are noted to be up to 2m depth for solar stations, BESS area and structural components within substations, or 4m for piles. The infrastructure for these components can be sited locally to avoid disturbing field drains, where practicable. Table 3-7: Hydrology and Flood Risk, of the **OCEMP** (Doc Ref. 7.10 Rev 3) secures the commitment to undertake drainage surveys to establish existing drainage positions, including field drainage. Table

[26] BRE Agricultural Good Practice Guidance for Solar Farms 2014: https://files.bregroup.com/solar/NSC_-Guid_Agricultural-good-practice-for-SFs_0914.pdf [Accessed 22/10/2026]

ExQ1	Question to:	Question:
		3-7 also confirms that any field drainage affected by the Scheme shall be either reinstated or diverted to secondary channels if reasonably practicable. Because land drainage is maintained throughout construction and operation, no drainage-related effects remain to be addressed at decommissioning. Below-ground infrastructure will be removed to the depth agreed with the landowner, and drainage will remain functional, so the land will be left in a satisfactory condition and suitable for return to agricultural use.

2.20. Other Environmental Topics

2.20.1. The below table sets out the Applicant's response to the ExA's written questions relating to other environmental topics.

Table 2.20-1: Other environmental topics

ExQ1	Question to:	Question:
Q20.0.1	The applicant	**Electric and magnetic fields** The EMF Compliance Report [APP-273] states that the cumulative assessment of EMF associated with the proposed development has been undertaken on the basis that a minimum separation distance of 80m would be maintained between the proposed development's 400kV GCR overhead line and the 400kV overhead lines associated with the future proposed Grimsby to Walpole and Weston Marsh to East Leicestershire development consent order schemes. However, in its RR [RR-138], WR [REP1-113], and during ISH1 [REP1-114], NGET indicated that the anticipated separation distance between the proposed development's 400kV overhead line and the future Grimsby to Walpole 400kV overhead line is likely to be 75m. Can the applicant explain the potential cumulative EMF implications arising from a separation distance of less than 80m between the overhead lines. The response should include consideration of whether a reduced separation distance would affect the conclusions of the EIA, including the conclusion that no significant effects are likely to occur.
		The Applicant considers that there is no material difference in effect between a separation distance of 75m and 80m. The EMF effects from 400kV overhead lines reduce dramatically with distance from the source, with negligible EMF field close to zero beyond about 50m from the source, as can be seen from Table 4-4 and Table 4-5 of **EMF Compliance Report** [APP-273]. The effect from the Grid Connection Route in these circumstances would therefore be immaterial and almost immeasurable within this distance from the overhead line, with the same principle applying to the

ExQ1	Question to:	Question:
		NGET's Grimsby to Walpole and Weston Marsh to East Lincolnshire DCO schemes, meaning none would be expected to materially contribute to the impact caused by another.
Q20.0.2	The applicant	**Glint and glare** The Planning Inspectorate's Scoping Opinion Report (ES Appendix 1-2: EIA Scoping Opinion [APP-167]) advises that the glint and glare assessment should consider all users of local PRoW during the operational phase of the proposed development. However, pedestrian users of PRoW have been scoped out of the applicant's assessment on the basis that there would be no adverse safety risk from glint and glare effects (ES Appendix 16-2: Glint and Glare Assessment [APP-255], [APP-256] and [APP-257]). Can the applicant explain the evidence and methodology used to conclude that glint and glare effects on pedestrian users of local PRoW would not give rise to adverse effects, and therefore justify their exclusion from the assessment, notwithstanding the recommendation set out in the Scoping Opinion?
		As set out in paragraph 2.3.5 of **ES Appendix 16-2: Glint and Glare Assessment - Part 1 Report and Annexes A to M** [APP-255], pedestrian users of PRoWs were scoped out of the assessment on the basis that glint and glare effects are not anticipated to give rise to adverse safety effects for this receptor group. Pedestrians are considered transient receptors and, where reflections occur, are able to avoid or minimise potential glare effects in the same manner as they would with direct sunlight. Individuals are able to continue walking safely despite the glint and glare or move out of the path of the glint and glare. Unlike horse riders or vehicle users, pedestrians are not considered to be subject to a material safety risk arising from glint and glare. This approach is consistent with that adopted for other recently consented or examined solar projects. For example, the glint and glare assessment for the West Burton Solar Project scoped out pedestrian users of PRoWs on the basis that they are low-sensitivity receptors, being tolerant of

ExQ1	Question to:	Question:
		change without detrimental effect and of local importance. Similarly, the Springwell Solar Farm glint and glare assessment scoped out pedestrians and other PRoW users, concluding that no significant effects were likely to arise. That assessment identified pedestrians as low-sensitivity receptors and noted that any effects would be of low magnitude due to the typically low numbers of users in rural locations, the temporary and transient nature of reflections, and the ability of pedestrians to move away from areas where reflections may be experienced. Having regard to the transient nature and sensitivity of pedestrian receptors, the limited potential for adverse effects, and the approach adopted on comparable solar projects, the Applicant considers that the scoping out of pedestrian users of PRoWs from the detailed glint and glare assessment is justified. The Applicant therefore remains satisfied that the methodology adopted is proportionate and that the scoping out of pedestrians from the assessment does not affect the conclusions of the Environmental Statement.
Q20.0.3	The applicant	**Glint and glare** ES Chapter 16: Other Environmental Topics [APP-067] states that yellow glare, which is considered an unacceptable effect for pilots on approach to a runway, is predicted to affect approach paths 03, 08 and 26 at Crowland Airfield. However, taking into account the airfield's published operating hours (08:30 coordinated universal time (UTC) to 17:00 UTC on days when the airfield is operational), the fact that the predicted glint and glare effects occur before 09:00 UTC, historical weather conditions during the periods when effects are predicted, and the mitigation measures typically available to pilots when flying towards the sun, the assessment concludes that effects on these runway approaches would be low, acceptable and not significant. Can the applicant explain: • The extent and significance of the predicted yellow glare effects on the approach paths if the Airfield's operating hours were to change, including circumstances where the airfield is open before 09:00 UTC at any time of year.

ExQ1	Question to:	Question:
		• Whether any such change in operating hours would affect the conclusions of the EIA, including the conclusion that the proposed development would not give rise to significant effects in respect of aviation receptors, and whether any additional assessment or mitigation would be required.
		Impacts are currently predicted to occur during the operational hours of the airfield, as outlined within **ES Appendix 16-2: Glint and Glare Assessment** [APP-255 to APP-257]. Yellow glare is only predicted to occur at or just after sunrise before 09:00 UTC. With the current operating hours of Crowland Airfield (08:30 UTC - 17:00 UTC), the predicted glint and glare impacts occur before 09:00 UTC. This means there is up to 30 minutes in the morning where glint and glare impacts are possible, albeit it is considered unlikely that aircraft would be landing at this time, with operating hours starting at 08:30 UTC. However, if aircraft was to land during this period, the impact can be mitigated by typical mitigation techniques used by pilots when flying in the direction of the sun, such as wearing sunglasses, using darkened cockpit sun visors, overflying and inspecting the runway, landing in the opposite direction, if wind conditions allow, and planning flight times to land outside the times when there is glare. These measures could also therefore be employed in the event of the Airfield's operational hours changing to increase the degree of overlap with the period when effects may occur (which is considered unlikely, as this would involve the Airfield deciding to commence operating before 08:30 UTC). The glint and glare effect from solar farms is generally considered by the aviation industry to be less intense than looking directly at the sun or from glint and glare from waterbodies or reflected from windows[27], for example.

[27] PagerPower (2022). Solar Photovoltaic Glint and Glare Study. Available at: 9455E_-_Solar_Photovoltaic_Glint_and_Glare_Study_-_Coleman_Land_July_2022_Redacted.pdf. Accessed 20.10.2026.

ExQ1	Question to:	Question:
		A meeting was held with the operators of Crowland Airfield (Peterborough and Spalding Gliding Club) on 10th December 2025 to discuss the potential glint and glare impacts and available mitigation, as assessed within **ES Appendix 16-2: Glint and Glare Assessment** [APP-255 to APP-257]. It was agreed that the assessment undertaken was appropriate for the airfield and that the glint and glare impacts and available mitigation measures were acceptable for the continued operation of aviation activities at Crowland Airfield. A **Statement of Common Ground with Peterborough and Spalding Gliding Club** [REP1-091] was subsequently prepared where all matters of concern regarding the construction and operation of the Scheme, including the results and conclusions of the Glint and Glare Assessment (SoCG Section 3), have been agreed with the airfield operators. Therefore, given the impacts are already predicted to occur during the operational times for a brief period, have already been accepted through consultation and production of a SoCG with Peterborough and Spalding Gliding Club, it is considered that the impacts would still remain acceptable should the operating hours change with the typical mitigation techniques used by pilots when flying in the direction of the sun. In addition, the Applicant notes that NPS EN-3 paragraph 2.10.151 states that: "*Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms.*"
Q20.0.4	The applicant	**Glint and glare** Given the scale and extent of the proposed solar PV development, can the applicant explain why the potential for a solar-induced heat island effect has not been assessed [RR-201]? Please provide

ExQ1	Question to:	Question:
		an assessment of the extent to which the proposed development may influence local microclimatic conditions and any consequential effects on the surrounding environment, including ecology, agricultural land, water resources and neighbouring receptors. Please also explain whether consideration of such effects should have formed part of the EIA and, if so, whether their omission has any implications for the robustness of the environmental conclusions presented in the ES.
		Regarding concerns over the thermal effects of black solar panels, the scientific literature currently does not present a consensus of the localised climate effects of solar panels. Masson *et al.*[28] suggest that solar farms may produce a cooling effect on land surface temperatures or otherwise cool completely overnight, making it unlikely for a heat island effect to occur. However, it is acknowledged that other research has also found warmer temperatures over PV panels than vegetated areas, particularly during the night. Published studies by Barron-Gafford, G., Minor, R., Allen, N. *et al.*[29] show an increase in local temperatures, with temperature at the centre of a large solar farm being up to 4°C higher than ambient conditions above the panels. However, an analysis from Fthenakis & Yu[30] has suggested that this heating effect is very localised, reducing to under 0.5 °C with 5 m of elevation and 300 m of horizontal distance. As demonstrated by the above studies there is no unified agreement as to the localised climate consequences associated with the

[28] Masson V, Bonhomme M, Salagnac J-L, Briottet X and Lemonsu A (2014) Solar panels reduce both global warming and urban heat island. Front. Environ. Sci. 2:14. doi: 10.3389/fenvs.2014.00014.
[29] Barron-Gafford, G., Minor, R., Allen, N. *et al.* The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures. *Sci Rep* **6**, 35070 (2016). https://doi.org/10.1038/srep35070
[30] Fthenakis and Yu (2013). Analysis of the potential for a heat island effect in large solar farms. Conference Record of the IEEE Photovoltaic Specialists Conference. DOI: 10.1109/PVSC.2013.6745171

ExQ1	Question to:	Question:
		installation of large-scale solar farms. While it is possible there will be temperature increases at an extremely localised scale, this is not expected to have a wider significant effect. The difference in findings is partly due to the different climatic conditions worldwide and where the research is conducted. In warm, desert climates, the solar panels can cause slightly elevated temperatures above the panels, whilst reducing the temperature below the panels and improving moisture retention in the soil. This does not cause any noticeable effects beyond the solar farm. The UK is not subject to these climate extremes, however, and therefore the findings differ in the UK. It is generally concluded that there is not a noticeable or substantial change to the micro-climate within the Site. During the peak summer, the panels will shade the ground and, therefore, offer protection to the grass and any sheep grazing the fields; the temperature difference above the panels (which are designed to absorb the sunlight, not reflect or focus it) will be negligible. On balance this is not considered a material risk for the Scheme, as any increase in localised temperatures is not expected to be noticeable or significant.
Q20.0.5	The applicant	**Materials and waste** The EIA (ES Chapter 16: Other Environmental Topics [APP-067]) assumes that recycling markets and infrastructure for solar PV panels and associated components will expand over the lifetime of the proposed development to meet future demand. Can the applicant identify the evidence relied upon to support this assumption and explain how sensitive its conclusions are to it? In particular, what would be the implications for the proposed development's waste management strategy, environmental effects and compliance with relevant waste hierarchy and circular economy objectives if sufficient recycling capacity is not available at the time operational equipment is replaced or the development is decommissioned?
		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, but it is likely that there

ExQ1	Question to:	Question:
		will be even greater opportunities for recycling in the future, on the basis that the recycling market will have expanded to meet demand as solar PV installations increase. This assumption is supported by the growth already observed in the PV recycling sector. Environment Agency statistics on 'WEEE received at an Approved Authorised Treatment Facility (AATF)'[31] show that the quantity of solar panels received annually for treatment at AATFs increased from 86.2 tonnes in 2018 to 1,662.5 tonnes in 2025, with a further 826.3 tonnes received during the first half (January to June) of 2026. This demonstrates a clear upward trend in both the demand for, and provision of, PV treatment and recycling services. The assessment is not considered highly sensitive to this assumption because it adopts a worst-case approach, assuming that all waste is disposed of to landfill. As a result, the assessment does not depend on future recycling capacity to demonstrate that significant environmental effects are unlikely. If recycling capacity is more limited than anticipated at the time of equipment replacement or decommissioning, waste would continue to be managed in accordance with the applicable regulatory framework and waste hierarchy. Whilst this could reduce the proportion of material recycled and, therefore, less aligned with circular economy objectives, waste could still be managed through alternative permitted recovery or disposal routes. Notwithstanding this position, the Applicant team has been in touch with several solar panel recycling facilities in the UK, who intend to expand their capacity and are very aware of the growth forecast for their industry in the UK. These companies will not invest and expand their operations until the market demand exists but are able to forecast with good accuracy when this will occur. The

[31] Environment Agency (2026) Statistical data set: Waste electrical and electronic equipment (WEEE) in the UK. Available at: https://www.gov.uk/government/statistical-data-sets/waste-electrical-and-electronic-equipment-weee-in-the-uk [Accessed 17/10/2026]

ExQ1	Question to:	Question:
		Applicant therefore expects that the recycling capacity will exist in the UK when the Scheme is decommissioned.
Q20.0.6	Lincolnshire County Council	**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.
Q20.0.7	The applicant	**Outline Operational Environmental Management Plan** Section 4 of the OOEMP [REP1-063] sets out the plans and procedures that support and complement the management plan. The Outline Site Waste Management Plan (OSWMP) [APP-285] does not appear within this list. Please explain why the OSWMP has been omitted and confirm whether it should be included. Please also identify any other relevant plans or procedures that should be listed as complementary documents and provide an updated list where necessary.
		The **Outline Site Waste Management Plan (OSWMP)** [APP-285] is for construction only. Requirements for operational waste are covered in Table 3-17 of the **OOEMP** (Doc Ref. 7.11 Rev 2) itself. As stated in Table 3-17 of the **OOEMP** (Doc Ref. 7.11 Rev 2), the detailed OEMP will use, as its starting point, the measures detailed in **OSWMP** [APP-285], but waste management measures

ExQ1	Question to:	Question:
		will form part of the detailed OEMP rather than being the subject of a standalone operational phase document. In this context, the Applicant does not consider it appropriate to list the **OSWMP** [APP-285] within Section 4 of the **OOEMP** (Doc Ref. 7.11 Rev 2), as it is a construction specific plan. However, the Applicant has updated the **OOEMP** (Doc Ref. 7.11 Rev 2) for Deadline 3 to reference **Appendix A: Outline Flood Emergency Response Plan** of the **OCEMP** [REP2-005], as this plan also includes requirements for the operational phase.
Q20.0.8	The applicant Peterborough and Spalding Gliding Club Ltd	**Peterborough and Spalding Gliding Club** The SoCG between the applicant and Peterborough and Spalding Gliding Club Ltd (PSGC) [REP1-091] (Ref. 5) states that "an appropriate side agreement is required between the parties to address the remaining interactions between the Gliding Club and the Project". The SoCG further confirms that the parties have agreed the terms of such an agreement in principle, subject to legal review by the Gliding Club's solicitor. The Applicant's **Glint and Glare Assessment** [APP-255], [APP-256] and [APP-257] and **EMF Compliance Report** [APP-273] conclude that glint and glare and EMF effects arising from the proposed development would not result in significant effects on the airfield or any other identified receptors. Further, ES Chapter 16: Other Environmental Topics [APP-067] concludes that there would be no significant effects in terms of major accidents and disasters. In light of these conclusions, can the applicant and PSGC explain: What "remaining interactions" between the proposed development and the Gliding Club require the provision of a "side agreement". The principal provisions of the proposed side agreement and how these are intended to address or mitigate the remaining interactions identified.

ExQ1	Question to:	Question:
		Whether any risks, impacts or operational constraints could arise if the side agreement is not finalised or entered into by the parties. How the side agreement would be administered. • The current status of the legal review and an indication of the anticipated timescale for concluding the agreement.
		The Applicant confirms the description set out by the Examining Authority in respect of the effects assessed within the Glint and Glare Assessment and EMF Compliance Report are correct. The Applicant does not consider any risks, operational constraints, or impacts would arise should the side agreement not be finalised. The Environmental Statement reflects the Applicant's conclusions in those documents that the Scheme does not pose any operational constraints or impacts to the Gliding Club. The terms of the side agreement remain confidential between the parties. The Applicant returned its latest comments to the Gliding Club's solicitors in the week commencing 26 October 2026. The Applicant considers the remaining matters between the parties will be able to be resolved within the timeframe of the Examination, and will updated the Examining Authority once this is confirmed.
Q20.0.9	The applicant	**Fenland Aero Club** The contents of the SoCG [REP1-091] with Peterborough and Spalding Gliding Club Ltd are noted, in particular the amendments made to address safety concerns. The applicant's efforts to engage with Fenland Aero Club are also noted.

ExQ1	Question to:	Question:
		However, despite the lack of engagement, what specific design measures or amendments to the proposed development have been made to address any potential aviation safety effects for the users of Fenland Aero Club? If no measures are considered necessary, please justify.
		The Applicant has assessed the potential for glint and glare effects at the Fenland Airfield in **ES Appendix 16-2: Glint and Glare Assessment - Part 1 Report and Annexes A to M** [APP-255]. Four runway approach paths and one Air Traffic Control Tower (ATCT) were assessed in detail at Fenland Airfield. No glare was predicted to impact the Runway 26, 18 and 36 approach paths or the ATCT at Fenland Airfield. Only green glare was predicted to impact the Runway 08 approach path at Fenland Airfield. Green glare is a low and an acceptable effect upon pilots approaching runways. The predicted impacts occur outside the operational hours of Fenland Airfield, and therefore the impact upon Fenland Airfield is none. The Applicant also considered the likelihood of the Scheme to lead to aircraft disasters, which included the consideration of Fenland Airfield, in Table 16-11 of **ES Chapter 16: Other Environmental Topics** [APP-067]. The chapter concludes that considering the assessment work undertaken with regards to glint and glare and the distance of the airfield from the Scheme (approximately 1.5km north-east of the Site), which provides appropriate physical separation, major accident and disaster risks are considered to be not significant. On this basis, the Applicant does not consider that any specific design amendments or mitigation measures are required with regards to Fenland Airfield.
Q20.0.10	The applicant	**Major accidents and disasters** Please advise where the ExA can find a plan illustrating the alignment of the InterGen NTS to Spalding PS Pipeline which crosses the order limits, that clearly identifies all proposed infrastructure

ExQ1	Question to:	Question:
		that would interact with, cross, be located in proximity to, or otherwise have the potential to affect the pipeline. If such a plan does not exist, please provide one.
		The Applicant has provided a new figure in **Appendix H** of this document, showing the alignment of the InterGen NTS to Spalding PS Pipeline which crosses the Order Limits. The figure shows the overlap with the illustrative Scheme layout, however, it is noted that the pipeline overlaps with the Work No. 14 area within the **Works Plans** [APP-010], which is subject to flexibility in accordance with the description of Work No. 14 within Schedule 1 of the **Draft DCO** (Doc Ref. 3.1 Rev 3) and the limits of deviation shown on **Works Plans** [APP-010]. The Applicant is seeking to agree bespoke protective provisions with Spalding Energy Company Limited and Spalding Energy Expansion Limited (subsidiaries of InterGen) to secure appropriate protection of the pipeline and to regulate the exercise of DCO powers in the vicinity of the pipeline.
Q20.0.11	The applicant	**Major accidents and disasters** ES Chapter 16: Other Environmental Topics [APP-067] states that, should consent be granted, a desk-based unexploded ordnance (UXO) study would be undertaken prior to construction of the proposed development. Given the area's history, including the presence of former air bases, known aircraft crash sites, anecdotal evidence of bomb offloading activities, and the proximity of Spalding, which was a military and industrial target during the Second World War, can the applicant explain: • Why this information has not been taken into account at this stage in assessing the likelihood and potential presence of UXO within the order limits. • The potential implications for the proposed development should UXO be present on site, including whether the presence of UXO could affect the findings of the EIA and, in particular, the conclusion that no significant effects are likely to occur in this respect.

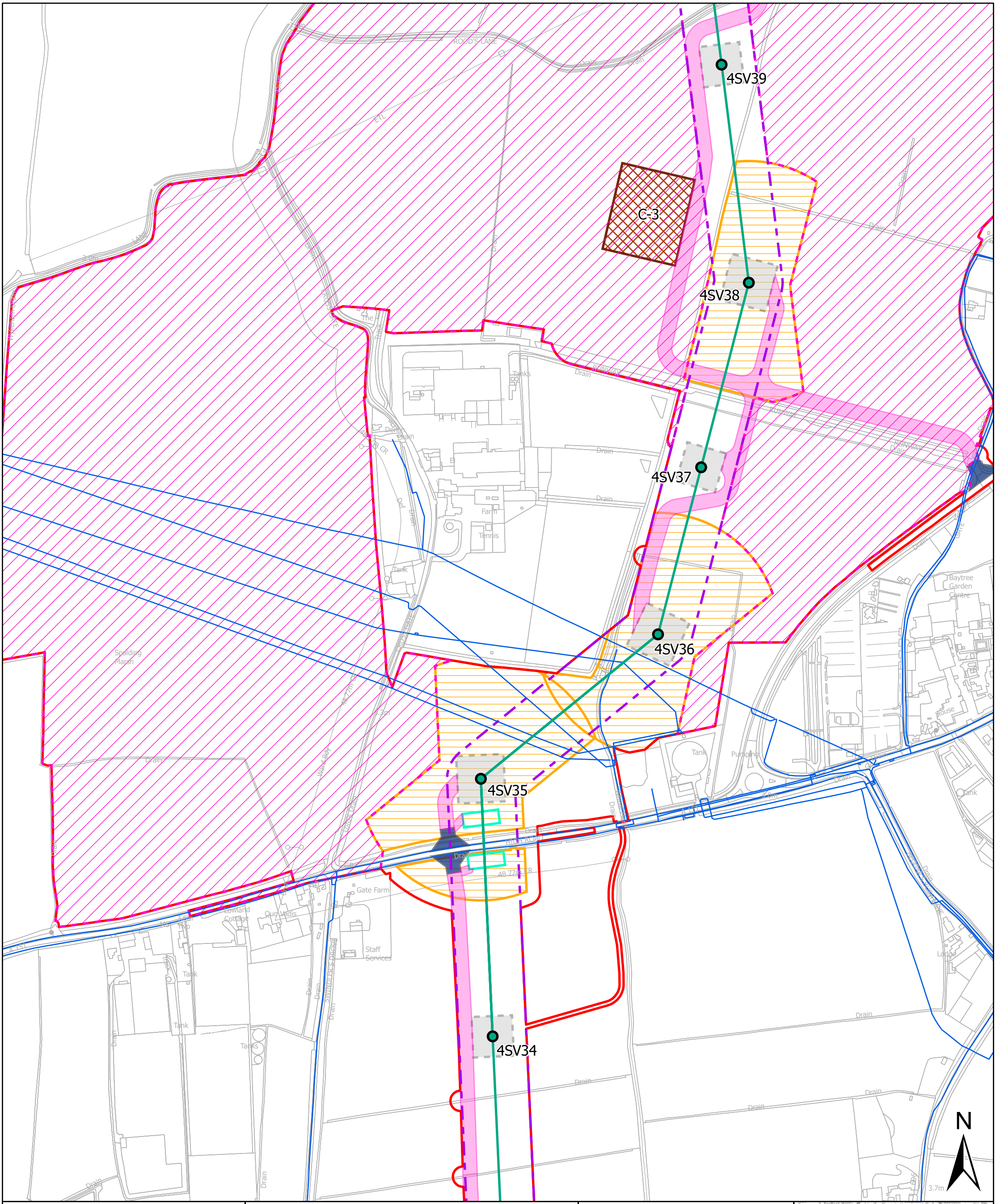
ExQ1	Question to:	Question:
		The detailed UXO risk assessment would need to be informed by detailed design, and as such, it is proposed to be undertaken post-DCO consent and pre-construction, as set out within Table 3-6 of the **OCEMP** (Doc Ref. 7.10 Rev 3). The presence of UXO would not prevent or constraint the Scheme layout. It can be dealt with and safely removed, but it is a key occupational health and safety hazard. Therefore, the UXO presence and location do not need to be known as part of or assessed within the EIA, but it would need to be known ahead of commencement of ground breaking activities on site to protect the workforce. Nevertheless, the parameters of the Scheme have been developed to avoid the highest areas of known UXO risk. For instance, Field D4 in Parcel D is the recorded crash site of World War II German Dornier bomber aircraft and the risk of UXO within this field remains high. As such, no physical development is proposed in this location and it has been marked as a habitat management area within the **OLEMP** (Doc Ref 7.16 Rev 2) and the **Works Plans** [APP-009], subject to a detailed UXO risk assessment.
Q20.0.12	Lincolnshire Fire and Rescue Service	**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.
Q20.0.13	The applicant	**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

ExQ1	Question to:	Question:
	Lincolnshire Fire and Rescue Service	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?
		As the Examining Authority notes, the **Applicant's Comments on Local Impact Reports** [REP2-015] confirmed the Applicant's agreement to the protective provisions for the benefit of Lincolnshire Fire and Rescue as appended to the **LCC's Local Impact Report** [REP1-106], and that these provisions would be incorporated into the **Draft DCO** (Doc Ref. 3.1 Rev 3) submitted at Deadline 3. This has now been done, and the Applicant considers that the protective provisions provide an appropriate securing mechanism for this financial contribution.
Q20.0.14	The applicant	**Major accidents and disasters** The fire safety and emissions documentation submitted in support of the application appears to focus on the BESS component of the proposed development. However, the proposed development would also comprise extensive solar PV arrays and associated electrical infrastructure, including inverters, transformers, substations and cabling. The applicant is requested to:

ExQ1	Question to:	Question:
		• Confirm whether fire risk assessments have been undertaken for the solar PV arrays and all other non-BESS elements of the proposed development. • Where such assessments have been undertaken, provide a summary of their findings, including any identified fire risks, proposed mitigation measures, and an explanation of how these have informed the EIA and the conclusions reached regarding likely significant effects. • Where such assessments have not been undertaken, explain the basis on which the applicant has concluded that fire-related effects associated with these elements would not give rise to likely significant effects. • In the absence of such assessments, set out the potential implications for the robustness of the EIA, including whether the findings and conclusions presented in relation to fire risk and likely significant effects could be materially affected.
		The Applicant acknowledges that the main fire risk for the Scheme, whilst considered unlikely, is associated with BESS and as such, an **Outline Battery Safety Management Plan** [REP2-006] has been submitted with the Application. Other non-BESS elements of the Scheme are not inherently associated with a high fire risk, based on compliance with existing legislation for fire safety. Fire risk assessments for construction and operation would form part of detailed design development for these elements of the Scheme in compliance with health and safety and fire regulations, including Construction (Design and Management) Regulations 2015 and the Regulatory Reform (Fire Safety) Order 2005. **ES Chapter 16: Other Environmental Topics** [APP-067], Table 16-11 refers to fire safety as part of the major accidents and disasters assessment and concludes that there would be no likely significant effects with compliance with existing legislation. These requirements will ensure that fire risks are appropriately considered through the design process and addressed through project-specific fire risk assessments. Any additional mitigation measures identified as necessary will be implemented through the detailed CEMPs and OEMPs. The Applicant does not therefore

ExQ1	Question to:	Question:
		consider the absence of fire risk assessments at this stage to have any implications for the robustness of the EIA. Notwithstanding the above, the Applicant provided further information on the management of fire safety and firefighting water at substations within Table 3-8 of the **OOEMP** (Doc Ref. 7.11 Rev 2) at Deadline 1, upon Environment Agency's request [RR-047]. This would be developed further in the detailed OEMP, as the fire risk assessment for detailed design is completed.

Appendix A: Q3.0.6 Locations of Anglian Water Pipeline assets north of the A151



Project Title

Meridian Solar Farm

Map Title

ExQ1 - Q.3.0.6: Locations of Anglian Water Pipeline assets north of the A151

Legend

- Order Limits
- Pylons
- Indicative OHL
- OHL Limit of Deviation
- Limit of Deviation for Routeing into Substation
- Construction Access
- Bellmouths
- Construction Compound
- Crossing Protections
- Working Area
- Stringing Positions
- Anglian Water Pipelines

Date: 19/10/2026

Copyright

FROM THE ORDNANCE SURVEY BY PERMISSION OF ORDNANCE SURVEY OF THE CONTROLLER OF HIS MAJESTY'S STATIONERY OFFICE. © CROWN COPYRIGHT AND DATABASE RIGHTS (2026) ORDNANCE SURVEY AC0000808122. BLUESKY INTERNATIONAL LTD ©

© DATA FROM ANGLIAN WATER SERVICES LIMITED

0 50 100 200 Metres

Scale @ A3	Version	Drawn	Reviewed
1:5,000	0	RD	JC

Notes:

1. Anglian Water pipeline locations are indicative only and have been identified through a desktop utility search conducted in June 2025.

Meridian Solar

Appendix B: Q6.0.23 Annual Report and Accounts for FY25 for Bagnall Energy Limited (dated September 2025)

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27



Bagnall Energy Limited

Annual Report and Accounts

For the year ended 30 September 2025

Company number 08349679

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Contents






OVERVIEW

4 Impact and Financial Highlights

STRATEGIC REPORT

6 Overview of Bagnall
7 Our Businesses at a Glance
8 Sector Breakdown and Portfolio Analysis
10 Sustainability and Responsible Investment
16 Trading Report
19 Portfolio Performance
21 Company Valuation

GOVERNANCE

25 Board of Directors
27 Directors' Report
29 Independent Auditor's Report

FINANCIAL STATEMENTS

35 Statement of Comprehensive Income
36 Balance Sheet
37 Statement of Changes in Equity
38 Notes to the Financial Statements
47 Glossary of Key Terms

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Overview



Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Impact and Financial Highlights

For the year ended 30 September 2025

Impact of the Bagnall portfolio:

- Bagnall's underlying portfolio of energy and infrastructure assets generated **504,334 MWh** of electricity.
- Enough to power **186,509 UK homes** and avoid **236,824 tonnes** of greenhouse gas emissions. Equivalent to:
  - Offsetting **1,047,325,668 aeroplane miles**
  - Planting **1,393,081 trees**
- Bagnall's portfolio now consists of **8,316 renewable generation assets.**

Highlights:

- Bagnall's net asset value ("NAV") increased by **23.0%** during the year, from **£423.3 million** to **£520.6 million**.
- The NAV per share increased from **147.1p** to **152.8p**, an increase of **3.9%**.
- Net fundraising during the period was **£78.7 million**.
- Total income generated by the underlying energy portfolio was **£38.7 million**.
- Portfolio highlights include:
  - Completed the purchase of two Ready-to-Build ("RTB") UK Solar Assets for £5.4 million, with a combined capacity of 77.4 MW, delivering Bagnall's strategy of increasing revenue certainty by focussing on Contracts for difference ("CfDs").
  - Completely exited from fossil fuel generation through the disposal of its UK gas peaker portfolio, providing growth opportunities through capital recycling.
  - Deployed £11.2 million into the development programme, including new projects to build a 49.9MW solar and potential co-located battery storage project in Norfolk; a 49.9MW Battery Energy Storage Systems ("BESS") project in Scotland and 60MW solar PV plant in Southern Finland.
  - Acquired Gabrielsberget South, a 46 MW onshore wind farm in northeast Sweden, for £27.5 million, materially scaling its Nordic wind exposure and complementing the existing Gabrielsberget North asset.
  - Legally committed to the acquisition of a 159MW portfolio of Solar and Hydropower assets as well as two Grid Infrastructure assets across the UK and Northern Europe. The acquisition completed in November 2025 and further diversifies the portfolio across geographies, technologies and revenue streams.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Strategic Report



Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Overview of Bagnall

Business Summary

Incorporated in March 2013, Bagnall Energy Limited ("Bagnall", the "Company") is a private limited company registered in England and Wales (company number 08349679). Bagnall's objective is to preserve capital while delivering long-term, stable returns to shareholders through a combination of income generation and capital growth. The Company seeks to achieve this by owning and operating renewable energy generation and related energy transition assets.

Since 2013, Bagnall has built a carefully curated and diversified portfolio of businesses operating across core and ancillary renewable energy sectors, including solar, wind, hydropower and battery storage. The Company's strategy is centred on diversification across geography, technology, asset life cycle and revenue sources. This diversification helps ensure that the performance of one asset or technology is not overly dependent on a single set of conditions. For example, high winds in Sweden is offset by lower solar generation in the UK, helping to support stable income across the portfolio.

A key strategic focus for Bagnall is the diversification of revenue streams to ensure the Company is not overly reliant on merchant power prices derived from selling electricity directly into wholesale markets. By balancing contracted and merchant revenues, Bagnall aims to create a portfolio that is resilient to market volatility. The Company believes this approach strengthens financial stability and provides a more predictable return profile for investors.

What We Do

Bagnall predominantly focuses on renewable energy generation assets with proven technologies, as well as battery storage projects.

Bagnall's core objectives are to:

- deliver steady and modest returns to shareholders, with a target return of 3 - 4.5% per annum over the medium term;
- trade in sectors we believe will qualify for business relief, which will enable investors to benefit from inheritance tax relief if their investment is held for at least two years and at the date of death;
- build a diversified portfolio of underlying businesses – including, but not limited to, diversity across technology, geography, business lifecycle stage, and revenues; and
- incorporate environmental, social and governance (ESG) factors into its business model.

Many of Bagnall's core energy businesses already have operational projects and well-established business models. A small part of the Company's strategy involves developing new renewable energy assets. This is essential for helping the UK transition to Net Zero emissions and achieve energy independence, reducing reliance on other countries for energy. This strategy is a key component of the portfolio, providing a stable foundation for long-term growth and promoting a cleaner, more sustainable future.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Our Businesses at a Glance



Energy & Infrastructure Businesses

- Hydro
- Solar
- Wind
- Storage

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Sector Breakdown and Portfolio Analysis

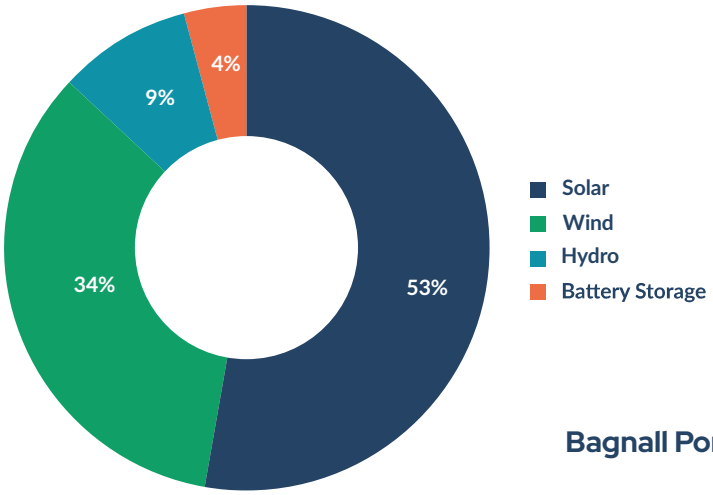
As at 30 September 2025, Bagnall's energy portfolio was valued at £547.1m and contained 8,316 renewable generation assets. The largest sector exposure is solar renewable energy.

Bagnall aims to diversify its energy portfolio across geography, technology, asset life cycle and revenue streams. Geographic diversification provides exposure to both the mature Nordic power markets and the UK power market, broadening the Company's risk profile and operational landscape. This approach also enables access to a wider range of technologies and market dynamics, contributing to a more balanced and predictable revenue mix across the portfolio. Details of Bagnall's sector and geographic allocation are presented below.

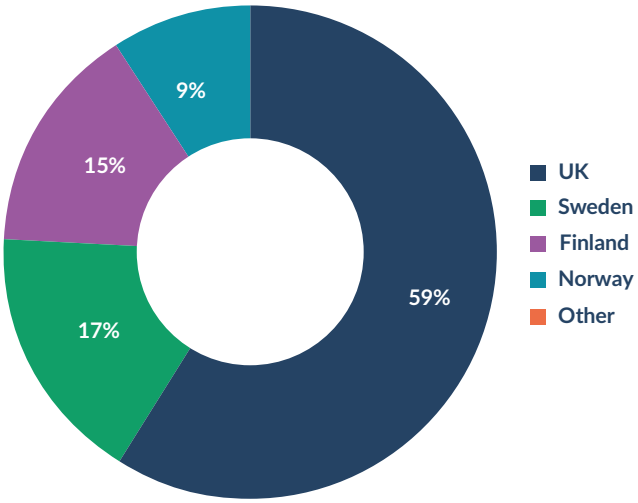
The portfolio valuation is the largest component of NAV, with cash and working capital comprising the balance.

The following charts show the diversification of Bagnall's energy portfolio by sector and geography as at 30 September 2025 and the Company's revenue mix for the year ended 30 September 2025.

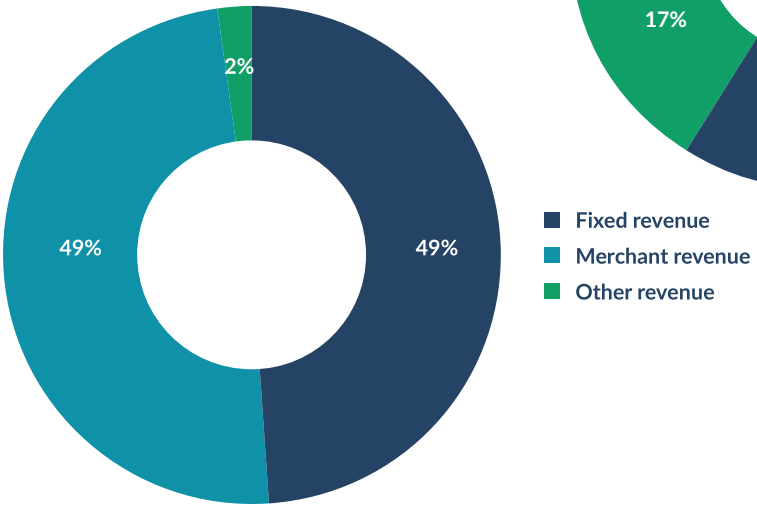
Bagnall Portfolio Mix - Technology



Bagnall Portfolio Mix – Geography



Bagnall Portfolio – Revenue Mix



Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Sector Breakdown and Portfolio Analysis continued

Detailed Portfolio Breakdown

Asset	Technology	Location	Lifecycle Stage	Valuation
Blackmead Rooftop HoldCo Ltd	Solar	UK	Operational	
Downing Commercial Rooftop Ltd	Solar	UK	Operational	
Downing Energy Development Company Ltd - Operational	Solar	UK	Operational	
Downing Energy Development Company Ltd - Development	Solar	UK	Development	
Downing Poultry Rooftop Ltd	Solar	UK	Operational	
Downing Residential Rooftop Ltd	Solar	UK	Operational	
Downing Spares Limited	Solar	UK	Operational	
Eider Solar LLP	Solar	UK	Operational	
Ethical Renewables Developments LLP	Solar	UK	Operational	
Evogreen Limited	Solar	UK	Operational	
Fair Park Solar Ltd	Solar	UK	Development	
Freeby Lane Green Energy Park Limited	Solar	UK	Development	£188.4m
Freetricity LLP	Solar	UK	Operational	
Indigo Generation Ltd	Solar	India	Other	
Ironhide Generation Ltd	Solar	India	Other	
Juno Holdings Ltd	Solar	UK	Operational	
Kingsway Solar Farm Limited	Solar	UK	Development	
Limes Farm Solar Park Limited	Solar	UK	Development	
Meerdyke Solar Limited	Solar	UK	Development	
Meridian Solar Farm Limited	Solar	UK	Development	
Monica Solar Limited	Solar	UK	Operational	
Rayvolution Solar Limited	Solar	UK	Construction	
Redburn Solar Ltd	Solar	UK	Operational	
Rockhopper Renewables Ltd	Solar	India	Other	
Suitian Aurinkovoima Oy	Solar	Finland	Development	
Magnus Finnish HoldCo Oy	Wind	Finland	Operational	
Nerth Energy Ltd	Wind	UK	Operational	£122.6m
Sweden Windco Limited	Wind	Sweden	Operational	
Rockberg AS	Hydro	Norway	Operational	£33.3m
Heanor Energy Storage Park Limited	Battery Storage	UK	Development	
Nursling Energy Ltd	Battery Storage	UK	Operational	£13.8m
Shift Energy Ltd	Battery Storage	UK	Operational	
Springbank Energy Storage Park Limited	Battery Storage	UK	Development	
Quoted equity	Other	UK	Other	£50.2m
Polar Nimrod Topco Limited	Other	UK	Other	£138.8m
				£547.1m

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Sustainability and Responsible Investment

Introduction

During the year, Bagnall has continued to facilitate investment into the core renewable technologies: solar, wind, and hydro. The Company also holds a small number of battery storage assets which complement the intermittency of renewable energy generating assets. These climate-friendly investments are helping to transition from fossil fuels to renewable energy. See below for a summary of Bagnall's environmental impact for the year ended September 2025:

504,334MWh
energy generated

Equivalent to
186,509
average UK households' annual electricity usage

236,824
tonnes of GHG emissions avoided

Equivalent to
1,047,325,668
aeroplane miles offset

Asset Management

Bagnall delegates the day-to-day management of its portfolio to Downing LLP, a professional asset manager (the "Manager").

As a certified B-Corporation and signatory to the UN Principles of Responsible Investment, the Manager takes seriously its responsibilities to all stakeholders, including future people and the environment. A three-part responsible investment framework is used to manage ESG risk to Bagnall's investments:

1. Proprietary ESG scorecards are prepared at the inception of each investment to identify and assess foreseeable and potential material ESG risks. Through this process, actions to address the risks are defined. These are reviewed by our in-house Sustainability Lead and discussed with the Investment Committee, forming part of their approval to invest.

2. Active engagement with the investee companies to address the material ESG risks identified ensures that they are appropriately managed. For example, the Manager may support the investee to put a waste management plan in place to optimise responsible reuse and costs, and/or an energy management plan in place to optimise usage and energy source.

3. Periodic disclosures of ESG information are made transparently to support accountability and informed decision making. Further to the case studies provided in this report you can read more about the Manager's approach in the annual Sustainability and Responsible Investment Report on the Manager's website:

   https://www.downing.co.uk/responsible-investing

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Educational and Community Engagement at Kounttisuo Wind Farm

In August 2025, Kounttisuo Wind Farm hosted a school visit for nine students aged 15–18, along with their principal, offering a hands-on introduction to renewable-energy operations. A separate online lecture was given to an additional 15 students, focusing on the fundamentals of wind-farm technology and the role of wind power in the energy transition. As part of ongoing community-outreach improvements, a new site sign was also installed to give an overview of the site.

These activities strengthen local community ties by supporting education, increasing awareness of clean-energy solutions, and providing teachers with real-world learning resources. They also help inspire future talent by showcasing the wide range of career paths available in the renewable-energy sector, from technical maintenance to environmental science. By engaging young people early, the initiative provides further benefits by promoting environmental responsibility, supporting social development, and demonstrating transparent, community-focused governance.

Approach to site selection and biodiversity in the UK

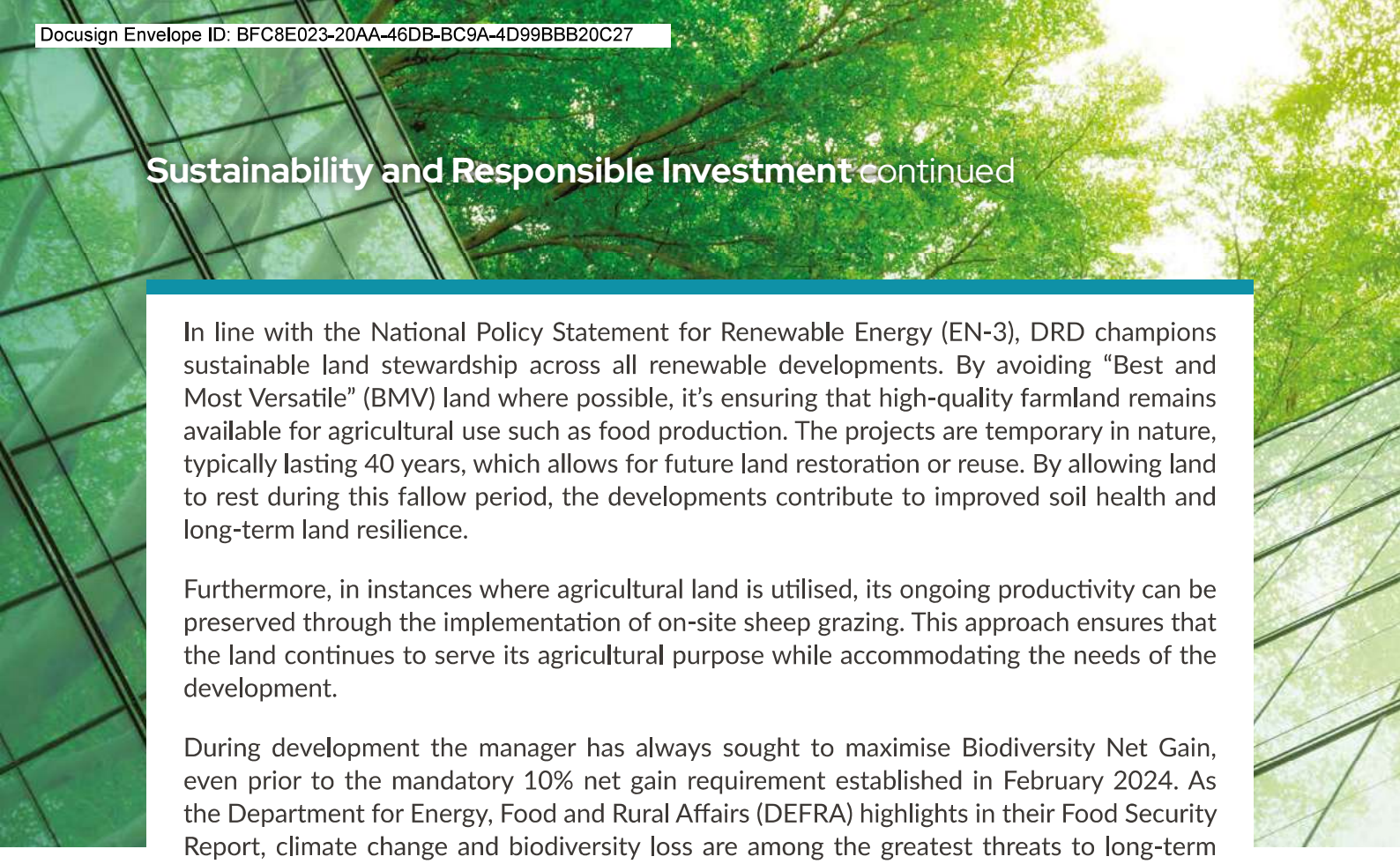
Through its partnership with Downing Renewable Developments (“DRD”) Bagnall is supporting the development of thousands of megawatts of solar, battery storage and onshore wind projects to help accelerate the UK’s transition to Net Zero. Together, we focus on utility-scale renewable energy projects that are environmentally responsible as well as technically and commercially viable.

Renewable energy infrastructure, whether it be solar, onshore wind or other technologies, requires careful land use planning to balance energy generation with environmental stewardship. Despite ambitious capacity targets, the total land footprint of renewables remains modest relative to energy output. For example, even with significant expansion, solar farms are projected to occupy less than 1% of UK land by 2050.





Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27



In line with the National Policy Statement for Renewable Energy (EN-3), DRD champions sustainable land stewardship across all renewable developments. By avoiding "Best and Most Versatile" (BMV) land where possible, it's ensuring that high-quality farmland remains available for agricultural use such as food production. The projects are temporary in nature, typically lasting 40 years, which allows for future land restoration or reuse. By allowing land to rest during this fallow period, the developments contribute to improved soil health and long-term land resilience.

Furthermore, in instances where agricultural land is utilised, its ongoing productivity can be preserved through the implementation of on-site sheep grazing. This approach ensures that the land continues to serve its agricultural purpose while accommodating the needs of the development.

During development the manager has always sought to maximise Biodiversity Net Gain, even prior to the mandatory 10% net gain requirement established in February 2024. As the Department for Energy, Food and Rural Affairs (DEFRA) highlights in their Food Security Report, climate change and biodiversity loss are among the greatest threats to long-term food security. DRD's projects address both, by contributing to the UK's legally binding Net Zero goals, whilst addressing loss in biodiversity.

Supply chain ESG risk screening tool

Procurement is critical throughout the lifecycle of E&I assets—from construction to optimisation and maintenance during operations. At Downing, responsible decision-making is embedded in every stage. Our internally developed Supplier ESG Risk Tool provides confidence in procurement by assessing supply chain risks across environmental, human rights (including labour rights), and governance factors such as corruption and bribery. This process aligns with global standards on human rights and ethical sourcing, ensuring resilience across markets.

With projects at various stages of development, construction, and operation, we work with a wide range of suppliers, including for critical equipment like solar panels—where supply chains have faced significant scrutiny. To mitigate these risks, we have implemented the following measures:

- Developed the Supplier ESG Risk Tool to assess and inform procurement decisions.
- Proactively selected low-risk suppliers aligned with Downing's sustainability framework and further commitments.
- Engaged meaningfully with suppliers—for example, reviewing efforts by a major PV manufacturer previously subject to allegations of forced labour, where our assessment found no evidence to substantiate the claims and supported a lower risk grade. Ensuring accurate information feeds into the Supplier ESG Risk Assessment.
- Fostered collaboration between the Sustainability and Technical Procurement teams to address ESG risks early in the process.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27



Key ESG KPIs

Performance of Bagnall's operational portfolio against its Key ESG Performance Indicators:

	FY 2025	FY 2024
Environmental Performance		
No. operational renewable generation assets	8,316	8,610
Operational renewable generation capacity (MWp)	278	410
Renewable energy generated (MWh)	504,334	304,206
Equivalent UK homes powered for the period	186,509	112,396
Share of non-renewable energy production	0%	6.7%
Equivalent trees planted	1,393,081	751,838
GHG emissions (Scope 1) (tCO2e)	nil	nil
GHG emissions (Scope 2) (tCO2e)	35*	24,654
GHG emissions (Scope 3) (tCO2e)	703	543
Total GHG emissions (tCO2e)	738	25,197
GHG emissions avoided (Scope 4, tCO2e)	237,106	127,812
Carbon footprint (tCO2e/€m)	2	76
GHG intensity (tCO2e/€m)	9**	408
Acres of land managed	2,436	2,411
Acres of land grazed	239	214
No. environmental incidents	1***	nil
Social Performance		
O&M FTE jobs supported	45	27
Health and safety audits	10****	55
Serious accidents or injuries	nil	nil
Local community complaints	nil	nil
Sites able to host educational visits	3	2
Renewable energy education events sponsored	10	10
Free or discounted renewable energy to homes and businesses (MWh)	28,031	25,416
Value of free or discounted renewable energy to homes and businesses	£8.4m	£6.0m
Governance Performance		
Portfolio board gender diversity (female : male ratio)	1:2.5	1:2.6

*Significant decrease in emissions due to the sale of the Gas Peaking portfolio

**Significant decrease in GHG intensity due to decrease in emissions. (2) Development sites are not included in this KPI as they don't have revenue, which is needed to calculate the KPI.

***Oil spill from contractor, not related to the wind farm, was discovered close to Konttisuo substation. Authorities were informed, and soil was decontaminated and soil recycled.

****H&S Audits programme carried out by the Manager with 18-month intervals for most assets, which creates lower and higher intensity periods.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27



Sustainability and Responsible Investment continued

Signatories and Memberships

The Manager's approach to Sustainability and Responsible Investment is grounded in commitment to the following frameworks and initiatives:

UN GLOBAL COMPACT

PRI Principles for Responsible Investment

UK STEWARDSHIP CODE

SASB SUSTAINABILITY ACCOUNTING STANDARDS BOARD

Certified B Corporation

TCFD TASK FORCE on CLIMATE-RELATED FINANCIAL DISCLOSURES

UKSIF UK Sustainable Investment and Finance Association

GRESB

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Sustainability and Responsible Investment continued

The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, offers a unified blueprint for peace and prosperity for people and the planet, both now and in the future. Central to this agenda are the 17 Sustainable Development Goals (SDGs), which call for urgent action by all countries, whether developed or developing, in a global partnership. These goals emphasize that ending poverty and other deprivations must be accompanied by strategies to improve health and education, reduce inequality, and stimulate economic growth, all while addressing climate change and preserving our oceans and forests.

The Manager has carefully chosen a select number of Sustainable Development Goals for the Company to focus on, where it believes Bagnall can have the greatest impact.



Target 7.1: by 2030, ensure universal access to affordable, reliable and modern energy services.

Target 7.2: by 2030, increase substantially the share of renewable energy in the global energy mix.



Target 9.4: By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities.



Target 13.3: Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.



Target 15.5: Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species.

Target 15.9: By 2030, integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts.

Target 15.a: Mobilise and significantly increase financial resources from all sources to conserve and sustainably use biodiversity and ecosystems.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Trading Report

Key Financial Metrics

	30 September 2025	30 September 2024
NAV	£520.6m	£423.3m
NAV per share	£1.53	£1.47
Annual total NAV return	+3.9%	+3.2%
Compound annual NAV return (since inception)	+3.4%	+3.4%
Profit after tax for the period	£18.6m	£12.7m

Portfolio Summary

As at 30 September 2025, Bagnall held a portfolio of over 8,316 energy installations. With a geographical focus in the UK and the Nordics, the portfolio includes four renewable generation and renewables-enabling technologies: solar, wind, hydropower and battery storage.

The UK Solar portfolio benefits from a range of government-backed support schemes, including the Renewable Obligations ("RO"), Feed-in Tariffs ("FiT"), and Contracts for Difference ("CfD"). Because these mechanisms provide fixed, index-linked pricing per unit of generation, the resulting revenues are considered low risk.

In addition, the portfolio receives stable income from Renewable Energy Guarantee of Origin certificates ("REGOs") in the UK and Guarantee of Origin certificates ("GOs") in the Nordics. These certificates are issued for each unit of renewable electricity produced and can be sold to utility companies. Over the past year, rising consumer demand has increased certificate prices, further enhancing asset returns.

Alongside these benefits, a significant proportion of generation is hedged in advance and sold under Route-to-Market arrangements, helping to limit exposure to wholesale market volatility.

During the year to 30 September 2025, approximately 49% of revenues were generated through fixed subsidies and 49% through the sale of electricity via power purchase agreements, the majority of which are with large utility companies and 2% through other revenue.

Portfolio Activity

Bagnall began the year by strengthening its Nordic wind position with the acquisition of Gabrielsberget South, a 20-turbine, 46MW wind farm in northeast Sweden, representing a £27.5m investment. This addition complemented the Company's existing stake in Gabrielsberget North and brought Bagnall's total exposure to Swedish wind to £60.6m at the end of the year.

Bagnall also made further investments into its development pipeline, including staged funding for Meerdyke, a 49.9MW solar site benefitting from planning permission, grid connection, land rights and a 15-year CfD contract; Springbank Energy Storage Park, a 49.9MW Battery Energy Storage Systems ("BESS") project in Scotland and Suitia, a 60MW solar PV plant in Southern Finland.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Other supported development projects include Meridian, Kingsway, Heanor, Freeby Lane, and Limes Farm, demonstrating its commitment to building a substantial pipeline of grid-secured UK solar and BESS assets.

Across the year, Bagnall completed its transition away from fossil fuel generation with a complete exit from its gas peaking portfolio in 2025. This divestment has made further capital available for reinvestment into core renewables. The proceeds supported ongoing expansion in solar, hydro and storage technologies aligned with Bagnall's long-term strategic objectives.

During the year, Bagnall invested £5.4m into a new portfolio, Rayvolution which currently comprises two UK solar ground-mounted projects with a combined capacity of 54.4 MWh and a 23 MWp solar project in Shropshire.

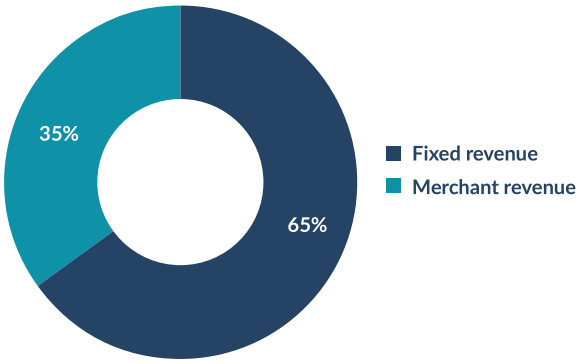
Throughout the year, Bagnall continued to deploy capital into its longstanding UK water-utility programmes, enhancing the Company's base of long-term, inflation-linked revenues. Follow-on investments across the Yorkshire Water and Southern Water portfolios supported the build-out of additional behind-the-meter solar assets, expanding a pipeline of sites underpinned by fixed-price, contracted offtake arrangements. By June 2025, multiple projects had reached energisation or Practical Completion, with the Northumbrian Water programme now fully operational. These assets now contribute to a growing stream of predictable, index-linked cashflows for Bagnall, supported by counterparties with strong credit profiles and limited exposure to wholesale market volatility.

Bagnall also continued to invest in and optimise its BESS strategy. Development of a new 49.9MW Scottish storage project Springbank Energy Storage Park was launched. These initiatives support Bagnall's strategy of incorporating grid-balancing assets that help mitigate the intermittency of its expanding renewables portfolio.

Revenue Composition

For the year ending 30 September 2026, Bagnall forecasts that 65% of its revenue composition will be derived from fixed revenue. Bagnall has a policy of fixing a higher proportion of its revenue in the near term, resulting in more predictable income and better financial planning.

Forecasted Revenue Mix for the year ending September 2026



Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Market Developments

Introduction

As a producer of electricity, Bagnall and its trading portfolio are subject to fluctuating energy prices. While much of the revenue that the portfolio generates is fixed, a proportion of its revenue mix is still exposed to market volatility. It is therefore important that Bagnall closely monitors the power markets in which it operates, assesses the risk that its economic environment presents, and implements a strategy that mitigates that risk.

GB Power Market

UK power prices fluctuated through the year as gas markets, weather conditions and renewable output alternated between tightening and easing supply. Early in the year, geopolitical tensions, cold weather and nuclear outages pushed prices higher. These rises were later offset by warm spells, strong wind and solar generation, and falling gas prices, which softened both spot and forward markets. Mid-year volatility persisted as tariff announcements, Middle East tensions and short-term demand changes created brief price spikes before renewed renewable output stabilised the market. By late summer, prices traded within a narrow range, supported by steady renewables and mild conditions.

Nordic Power Market

Weather-driven conditions dominated Nordic power prices throughout the year. Early periods of high wind speeds and strong German PV output kept spot prices low, while high precipitation and a large hydrological surplus continued to weigh on forward prices. As spring approached, low precipitation and weaker wind output temporarily pushed prices higher before wetter forecasts softened the market again. Over the summer, prices remained generally subdued as the region entered its low-demand season and renewable output stayed strong, despite intermittent dry weather adding short-lived upward pressure. Later in the year, pricing stabilised within a narrow range amid steady hydro balances.

Response

Market developments are monitored daily by the Manager's dedicated energy market specialist team. This team regularly reports to the Company's directors and advises on actions that can be taken to reduce the risk that volatile power prices represent to Bagnall's revenue streams. One way in which Bagnall manages its risk profile is by fixing its revenue through long-term and inflation-linked power price agreements. It is forecasted that only 35% of Bagnall's revenue mix for its 2026 financial year will be exposed to power price movements.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Portfolio Performance

Introduction

In the year ended September 2025, the portfolio generated 504,334MWh of clean electricity, which is equivalent to powering 186,509 UK homes. Operating profit across Bagnall's operational portfolio during the period was £23.0m with generation for the year being 10.5% below expectations.

Solar Energy

The Bagnall solar portfolio consists of ground-mounted, commercial rooftop, and residential rooftop systems. The number of total installations dropped from the year ended September 2024, from 8,587 to 8,298 and from 163.8 MWp to 135.7 MWp generating capacity. During the period the portfolio generated approximately 123,359 MWh of clean energy.

Most of these assets benefit from either Renewables Obligation (RO), Northern Ireland Renewables Obligation ("NIRO"), Contracts for Difference (CfD) or FiT UK government-backed indexed linked schemes supporting their revenues. The remaining revenues are generated through the sale of electricity via external counterparties or on-site energy sales agreements, and through REGO sale agreements.

Operating profit across the solar portfolio was £19.6m for the year. This was 2.0% above expectations, driven by revenues being 2.7% above expectations.

Wind Energy

As at 30 September 2025, Bagnall's wind portfolio totalled fifty-three turbines: six in the UK, seven in Finland, and forty in Sweden. During the period the portfolio generated approximately 347,267 MWh of clean energy.

As with the solar portfolio, the UK wind assets generate income through the FiT government-backed and indexed-linked subsidy scheme, and through the sale of electricity and REGO certificates. In Finland and Sweden, income is generated through the sale of green GO certificates and through the sale of electricity.

Operating profit for the year was £1.3m. This was 56.1% below expectations. Whilst generation across the portfolio was 3.7% above expectations, revenue was suppressed by low merchant power prices in the Nordic regions which were mitigated by entrance into the Fast Frequency reserve market by the Nordic wind assets earning a total of £1.3m.

Hydropower

All nine of Bagnall's hydropower plants are run-of-the-river plants situated in Norway. Income and generation are directly tied to the local inflow driven by weather. During the period the portfolio generated approximately 33,709 MWh of clean energy.

The portfolio benefits from partial pay as you produce PPAs in addition to income through the sale of green GO certificates.

Operating profit for the year was £1.0m, this was 22.5% below expectations which was driven by lower- than-expected market price, as well as higher- than-expected operational expenditure. Plant availability was in line with expectations for the period, but generation was adversely impacted by large variances in precipitation. Lower precipitation levels at the start of the year and then delayed

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

spring floods. During these spring floods, water levels were higher than the plants discharge capacity and so energy generation was capped for periods of time.

Battery Storage

Operating profit for the year was £1.1m, this was 52.0% below expectations. Performance is largely attributed to a single 50 MWp battery asset. Availability was below expectations for the year due to transformer outages. The Manager is in the process of installing replacements to ensure optimal performance of the asset moving forward.

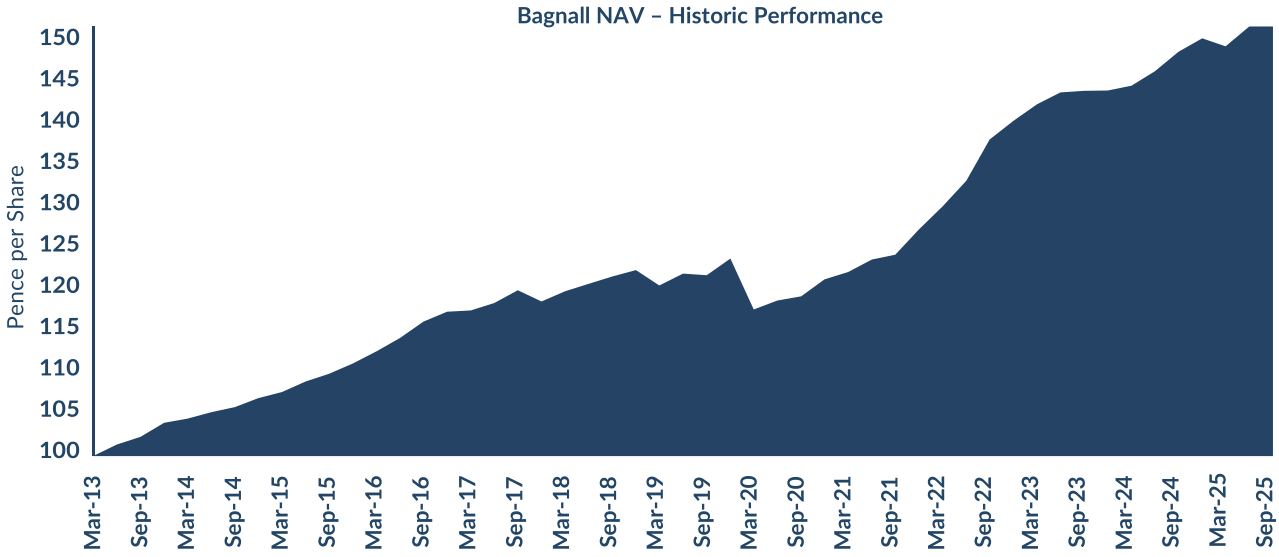
Reserve Power

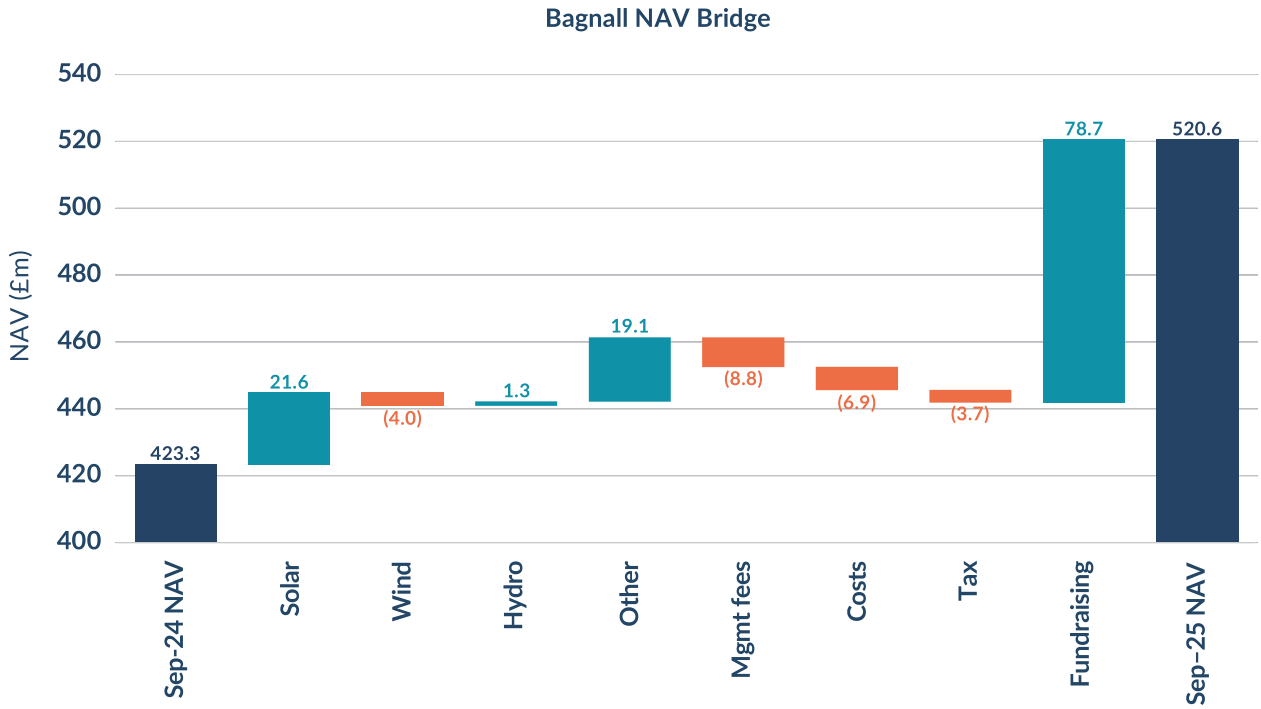
The six gas peaking projects in the UK which Bagnall had interests in, totalling a capacity of 101 MW, were sold shortly following the year end. The entire portfolio was sold in line with its valuation. This is representative of Bagnall's strategy to focus its investment activity on core renewable energy assets.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Company Valuation

In the year to 30 September 2025, the net asset value of Bagnall increased by £97.3m to £520.6m. On a pence per share basis, this equates to an increase of 5.7p, from 147.1p to 152.8p, delivering a total return of 3.9% for the year.





Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Company Valuation continued

Solar Valuation

The total return from the solar portfolio was £21.6m, contributing 6.9p to the NAV per share for the year. This uplift was supported by the recognition of value as assets progressed through development and construction, alongside continued optimisation across Bagnall's diversified solar platform

Wind Valuation

The total loss from the wind assets across the portfolio was £4.0m, contributing 1.3p decrease to the NAV per share for the year. Driven by materially lower merchant power prices in Finland and Sweden and periods of manual curtailment during negative-price events, which together outweighed strong operational availability and ancillary service income.

Hydropower Valuation

The total return of the hydropower portfolio was £1.3m, contributing 0.4p to the NAV per share over the year. Driven by stable contracted revenues and disciplined cost control, which offset the impact of lower-than-expected water inflows across the Nordic assets.

Other Valuations

The value of Bagnall's other holdings increased by £19.1m, resulting in a positive contribution of 6.2p to the NAV per share over the year. This uplift was primarily driven by the strong market performance of the Company's listed renewable infrastructure holdings, the value of which was crystallised post year end. Further gains arose from continued progress across Bagnall's battery-storage development companies.

Management Fees

Management fees resulted in a £8.8m reduction in value over the year, equating to a 3.1p decrease in the NAV per share. This movement reflects the Company's fee arrangements with its investment manager, which scale with both the size and composition of the portfolio.

Running Costs

Running costs reduced the NAV by £6.9m over the year, equating to a 2.2p decrease per share. This movement reflects the aggregate impact of the Company's running costs, finance costs and foreign exchange movements across the portfolio. These items represent the normal cost of operating and financing a diversified, multi-jurisdictional asset base and are consistent with the ongoing requirements of managing Bagnall's development, construction and operational activities.

Tax

Tax reduced the NAV by £3.7m over the year, equating to a 1.2p decrease per share. This movement reflects the accrual of corporation tax. These tax charges form part of the normal operation of the portfolio and are consistent with the Company's structure.

Fundraising

During the year ended 30 September 2025, Bagnall increased capital by £78.7m, net of redemptions. This takes the total net equity raised to £426.0m since inception.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Company Valuation continued

Outlook

The directors are again pleased with the results for the year ending 30 September 2025. The inflation-linked nature of a substantial portion of the Company's revenues, combined with the continued diversification across technologies and geographies, has supported resilient performance despite varying power-market conditions. At an asset level, the Manager's in-house asset management team remained focused on driving operational excellence throughout the year. One example of this was the successful execution of portfolio-wide optimisation initiatives, including enhanced spare-parts readiness and proactive component replacement strategies, which reduced outage durations and improved availability across several operating assets.

Following the year-end, Bagnall completed the acquisition of Oyadalen, a 7GWh dispatchable hydropower plant in Norway's NO3 price zone. This addition represents the Company's first fully dispatchable hydro asset and enhances the flexibility of its existing run-of-river Nordic portfolio. The Company also continued to deploy capital into its development pipeline, including further investment into the DRD framework, such as a 60MW solar PV project in southern Finland, alongside ongoing commitments to the Yorkshire Water and Southern Water solar programmes.

Bagnall also progressed its CfD-backed ready-to-build strategy, advancing two significant UK solar transactions, both of which are undergoing late-stage due diligence and are expected to form part of the Company's expanding contracted solar portfolio.

Post year end, Bagnall completed the acquisition of Downing Renewables & Infrastructure Trust, strengthening its position in long-term, contracted energy-transition assets across the UK and Nordics. Through this acquisition, Bagnall assumed ownership of DORE's diversified portfolio, which includes Swedish and Icelandic hydropower assets, as well as UK and Northern European solar, wind, and grid-stability infrastructure investments.

The integration of these assets expands Bagnall's footprint across multiple geographies and technologies, enhances its exposure to dispatchable hydro generation, and adds further contracted and regulated cashflows that align with the Company's long-term strategy of building a resilient, income-generative renewable energy platform.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

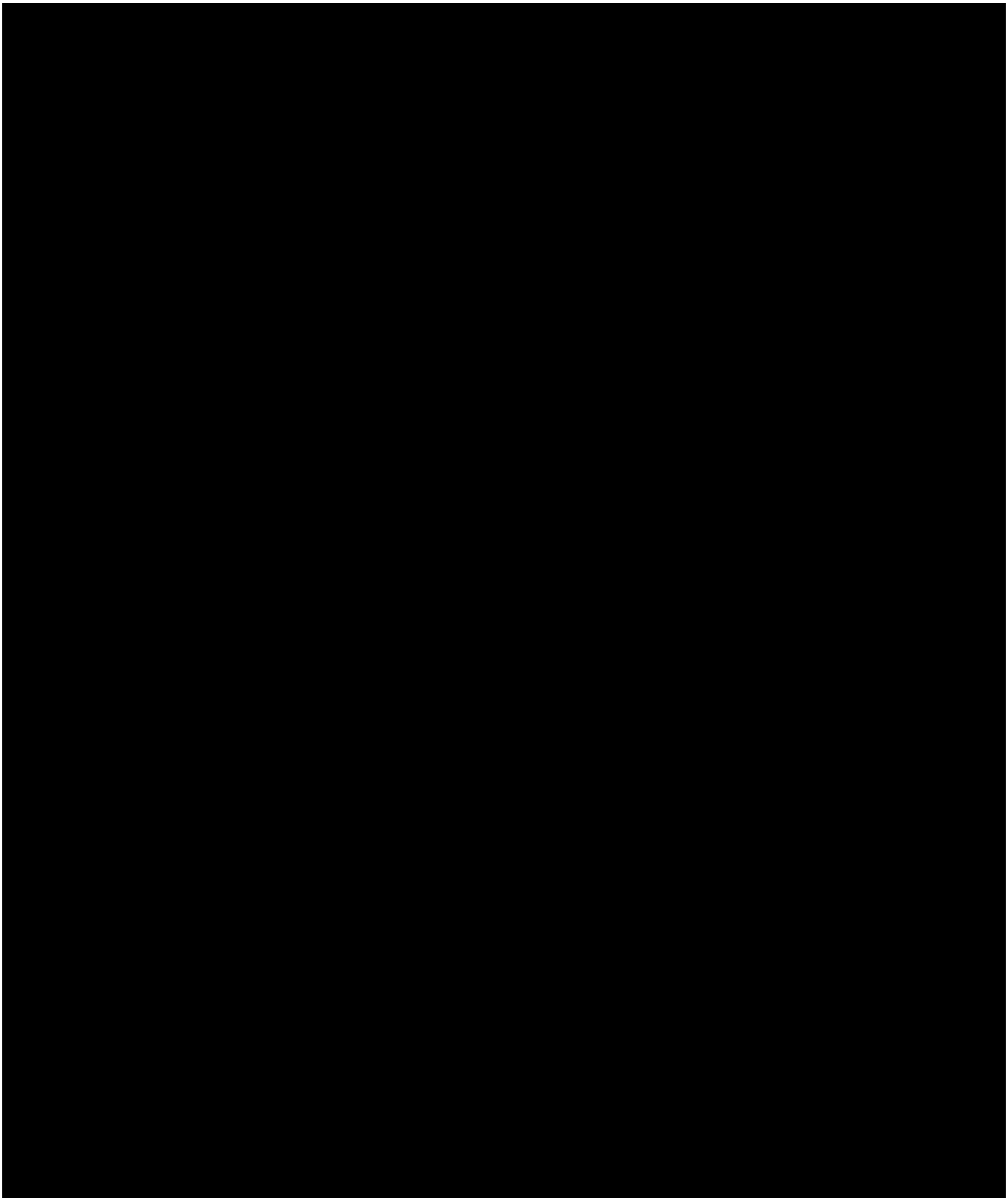
Governance



Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

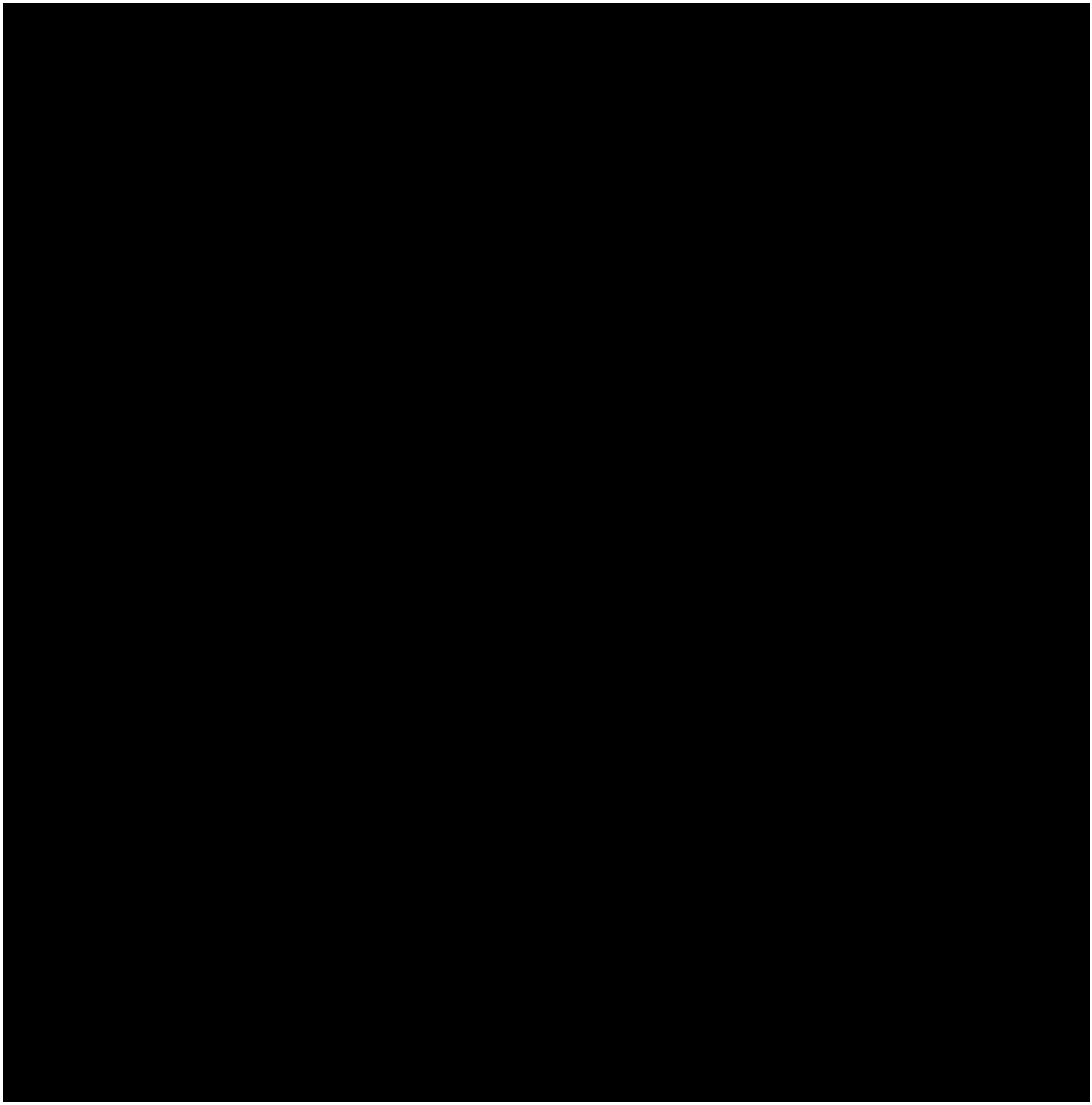
Board of Directors

Bagnall has four non-executive directors, three of whom are independent from both the day-to-day management of the company and the Manager. The directors hold board meetings at least once a quarter, liaise with the Manager regarding potential opportunities, hold annual strategy reviews with the Manager, and deal with ad hoc issues connected to the management of the portfolio.



Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Board of Directors continued



Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Directors' Report

For the year ended 30 September 2025

The directors present their report and the financial statements for the year ended 30 September 2025.

Directors' responsibilities statement

The directors are responsible for preparing the Directors' Report and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice), including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland'. Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the company and of the profit or loss of the company for that period.

In preparing these financial statements, the directors are required to:

- select suitable accounting policies for the company's financial statements and then apply them consistently;
- make judgments and accounting estimates that are reasonable and prudent;
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the company's transactions and disclose with reasonable accuracy at any time the financial position of the company and to enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

Principal activity

The company's principal activity during the year was energy generation together with making loans to energy businesses through its trading entities.

Directors

The directors who served during the year were:



Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Disclosure of information to auditors

Each of the persons who are directors at the time when this Directors' Report is approved has confirmed that:

- so far as the director is aware, there is no relevant audit information of which the Company's auditors are unaware, and
- the director has taken all the steps that ought to have been taken as a director in order to be aware of any relevant audit information and to establish that the Company's auditors are aware of that information.

Auditors

Under section 487(2) of the Companies Act 2006, Lubbock Fine LLP will be deemed to have been reappointed as auditors 28 days after these financial statements were sent to members or 28 days after the latest date prescribed for filing the accounts with the registrar, whichever is earlier.

Small companies note

In preparing this report, the directors have taken advantage of the small companies exemptions provided by section 415A of the Companies Act 2006.

This report was approved by the board and signed on its behalf.

Signed by:

[redacted]

Chairman

Date: 16 April 2026

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Independent Auditor's Report to the Members of Bagnall Energy Limited

Opinion

We have audited the financial statements of Bagnall Energy Limited (the 'Company') For the year ended 30 September 2025, which comprise the Statement of Comprehensive Income, the Balance Sheet, the Statement of Changes in Equity and the related notes, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- give a true and fair view of the state of the Company's affairs as at 30 September 2025 and of its profit for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditors' responsibilities for the audit of the financial statements section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the United Kingdom, including the Financial Reporting Council's Ethical Standard and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the directors with respect to going concern are described in the relevant sections of this report.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Independent Auditor's Report to the Members of Bagnall Energy Limited continued

Other information

The other information comprises the information included in the Annual Report other than the financial statements and our Auditors' Report thereon. The directors are responsible for the other information contained within the Annual Report. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon. Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the course of the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinion on other matters prescribed by the Companies Act 2006

In our opinion, based on the work undertaken in the course of the audit:

> the information given in the Directors' Report for the financial year for which the financial statements are prepared is consistent with the financial statements; and

> the Directors' Report has been prepared in accordance with applicable legal requirements.

Matters on which we are required to report by exception

In the light of the knowledge and understanding of the Company and its environment obtained in the course of the audit, we have not identified material misstatements in the Directors' Report.

We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

> adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or

> the financial statements are not in agreement with the accounting records and returns; or

> certain disclosures of directors' remuneration specified by law are not made; or

> we have not received all the information and explanations we require for our audit; or

> the directors were not entitled to prepare the financial statements in accordance with the small companies regime and take advantage of the small companies' exemptions in preparing the Directors' Report and from the requirement to prepare a Strategic Report.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Independent Auditor's Report to the Members of Bagnall Energy Limited continued

Responsibilities of directors

As explained more fully in the Directors' Responsibilities Statement set out on page 28, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an Auditors' Report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

- Enquiries of management, including obtaining and reviewing supporting documentation, concerning the company's policies and procedures relating to:
  - identifying, evaluating and complying with laws and regulations and whether they were aware of any instances of non-compliance;
  - detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected or alleged fraud;
  - the internal controls established to mitigate risks related to fraud or non-compliance of laws and regulations; and
- Discussions among the engagement team regarding how and where fraud might occur in the financial statements and any potential indicators of fraud. The engagement team includes audit partners and staff who have extensive experience of working with entities in similar sectors and this experience was relevant to the discussion about where fraud risks might arise.

We also obtained an understanding of the legal and regulatory framework that the company operates in, focusing on provisions of those laws and regulations that had direct effect on the determination of material amounts and disclosures in the financial statements. The key laws and regulations we considered in this context included the Companies Act 2006 and Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland'.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

In addition, we considered provisions of other laws and regulations that do not have a direct effect on the financial statements but compliance with which may be fundamental to the company's ability to operate or to avoid a material penalty. These included Financial Conduct Authority regulations, health and safety regulations, employment law and environmental regulations.

As a result of these procedures we considered the particular areas that were susceptible to misstatement due to fraud were in respect of management override, investment valuation and revenue recognition. Our procedures to respond to risks identified included the following:

- reviewing the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described as having a direct effect on the financial statements;
- enquiring of management concerning actual and potential litigation and claims;
- performing analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud;
- testing the existence of a sample of investments;
- holding discussions with the investment manager and relevant third parties to ensure we understand the calculations of the fair value of a sample of the investments and can evaluate the fair value of each investment in the sample;
- reviewing the validity of the inputs incorporated into the fair value calculations of the investments;
- reading minutes of meetings of those charged with governance;
- in addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments;
- assessing whether the judgements made in making accounting estimates are indicative of a potential bias;
- evaluating the rationale of any significant transactions that are unusual or outside the normal course of operations.

Because of the inherent limitations of an audit, there is a risk that we will not detect all irregularities, including those leading to a material misstatement in the financial statements or non-compliance with regulation. This risk increases the more that compliance with a law or regulation is removed from the events and transactions reflected in the financial statements, as we will be less likely to become aware of instances of non-compliance. The risk is also greater regarding irregularities occurring due to fraud rather than error, as fraud involves intentional concealment, forgery, collusion, omission or misrepresentation.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our Auditors' Report.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Independent Auditor's Report to the Members of Bagnall Energy Limited continued

Use of our report

This report is made solely to the Company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the Company's members those matters we are required to state to them in an Auditors' Report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members, as a body, for our audit work, for this report, or for the opinions we have formed.

[redacted]enior Statutory Auditor)
for and on behalf of
Lubbock Fine LLP
Chartered Accountants & Statutory Auditors
Paternoster House
65 St Paul's Churchyard
London
EC4M 8AB

Date: 16 April 2026

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Financial Statements



Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Bagnall Energy Limited
Statement of Comprehensive Income
For the year ended 30 September 2025

	2025 £'000	2024 £'000
Share of trading loss	(1,882)	(741)
Administrative expenses	(15,798)	(8,039)
Other operating income	15,284	7,716
Operating profit	**(2,396)**	**(1,064)**
Gain on disposal of investments in trading entities	–	133
Impairment of investment in trading entities	748	(10,140)
Interest receivable and similar income	14,739	12,922
Interest payable and similar expenses	(1,456)	(9)
Fair value movements on investments in trading entities	10,655	8,899
Profit before tax	**22,290**	**10,741**
Tax / Credit on profit	(3,672)	1,984
Profit for the year	**18,618**	**12,725**

There were no recognised gains and losses for 2025 or 2024 other than those included in the statement of comprehensive income.

There was no other comprehensive income for 2025 (2024: £nil).

The notes on pages 38 to 46 form part of these financial statements.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Bagnall Energy Limited

Balance Sheet

For the year ended 30 September 2025

	Note	2025 £'000	2025 £'000	2024 £'000	2024 £'000
Fixed assets					
Investments in trading entities	4		547,069		372,821
			547,069		372,821
Current assets					
Debtors: amounts falling due after more than one year	5	1,238		4,978	
Debtors: amounts falling due within one year	5	19,904		9,518	
Cash at bank and in hand	6	27,505		39,032	
		48,647		**53,528**	
Creditors: amounts falling due within one year	7	(4,139)		(3,030)	
Net current assets			44,508		50,498
Total assets less current liabilities			**591,577**		**423,319**
Creditors: amounts falling due after more than one year			(70,942)		–
Net assets			**520,635**		**423,319**
Capital and reserves					
Called up share capital	9		3,408		2,878
Share premium account			150,045		71,880
Revaluation reserve			40,047		29,392
Capital redemption reserve			6		3
Profit and loss account			327,129		319,166
			520,635		**423,319**

The financial statements have been prepared in accordance with the provisions applicable to companies subject to the small companies regime and in accordance with the provisions of FRS 102 Section 1A - small entities.

The financial statements were approved and authorised for issue by the board and were signed on its behalf by:

Signed by:

[redacted]

Chairman

Date: 16 April 2026

The notes on pages 38 to 46 form part of these financial statements.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Bagnall Energy Limited

Statement of Changes in Equity

For the year ended 30 September 2025

	Called up share capital	Share premium account	Capital Re-demption reserve	Re-valuation reserve	Profit and loss account	Total equity
	£'000	£'000	£'000	£'000	£'000	£'000
At 1 October 2023	2,702	46,516	3	21,525	314,308	385,054
Comprehensive income for the year						
Profit for the year	–	–	–	–	12,725	12,725
Shares issued during the year	176	25,364	–	–	–	25,540
Transfer from profit and loss account	–	–	–	7,867	(7,867)	–
At 1 October 2024	**2,878**	**71,880**	**3**	**29,392**	**319,166**	**423,319**
Comprehensive income for the year						
Profit for the year	–	–	–	–	18,618	18,618
Purchase of own shares	–	–	3	–	–	3
Shares issued during the year	530	78,165	–	–	–	78,695
Transfer to profit and loss account	–	–	–	10,655	(10,655)	–
At 30 September 2025	**3,408**	**150,045**	**6**	**40,047**	**327,129**	**520,635**

The notes on pages 38 to 46 form part of these financial statements.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Bagnall Energy Limited

Notes to the Financial Statements

For the year ended 30 September 2025

1. General information

Bagnall Energy Limited is a private company limited by shares incorporated in England and Wales. Its registered office and principal place of business is 10 Lower Thames Street, London, EC3R 6AF.

2. Accounting policies

2.1 Basis of preparation of financial statements

The financial statements have been prepared under the historical cost convention unless otherwise specified within these accounting policies and in accordance with Section 1A of Financial Reporting Standard 102, the Financial Reporting Standard applicable in the UK and the Republic of Ireland and the Companies Act 2006.

The following principal accounting policies have been applied:

2.2 Exemption from preparing consolidated financial statements

The company, and the Group headed by it, qualify as small as set out in section 383 of the Companies Act 2006 and the parent and Group are considered eligible for the exemption to prepare consolidated accounts.

2.3 Income

Included within investments in trading entities are interests in trading partnerships. Income from trading partnership interests is described within the financial statements as share of trading partnership profits, and is recognised once allocated to the partnership.

Included within investments in trading entities are investments in shares of trading entities. Returns from investments in shares in trading entities in respect of priority returns are recognised as income in the Statement of Comprehensive Income if received during the year. Where priority returns are accrued but not received during the year, they are recognised, together with any corresponding impairments, as a movement in the fair value of the investment through the profit and loss account and recognised in the Statement of Comprehensive Income.

2.4 Impairment of fixed assets and goodwill

Assets that are subject to depreciation or amortisation are assessed at each balance sheet date to determine whether there is any indication that the assets are impaired. Where there is any indication that an asset may be impaired, the carrying value of the asset (or cash-generating unit to which the asset has been allocated) is tested for impairment. An impairment loss is recognised for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's (or CGU's) fair value less costs to sell and value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows (CGUs). Non-financial assets that have been previously impaired are reviewed at each balance sheet date to assess whether there is any indication that the impairment losses recognised in prior periods may no longer exist or may have decreased.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

2. Accounting policies continued

2.5 Finance costs

Finance costs are charged to profit or loss over the term of the debt using the effective interest method so that the amount charged is at a constant rate on the carrying amount. Issue costs are initially recognised as a reduction in the proceeds of the associated capital instrument.

2.6 Interest income

Interest income is recognised in profit or loss using the effective interest method.

2.7 Taxation

Tax is recognised in profit or loss except that a charge attributable to an item of income and expense recognised as other comprehensive income or to an item recognised directly in equity is also recognised in other comprehensive income or directly in equity respectively.

The current income tax charge is calculated on the basis of tax rates and laws that have been enacted or substantively enacted by the balance sheet date in the countries where the company operates and generates income.

2.8 Valuation of investments in trading entities

Investments in trading entities are measured at fair value and managed in accordance with the company's documented policies.

The valuation of an investment upon acquisition is initially deemed to be cost and is measured subsequently at fair value. Fair value movements in the valuation of an investment are taken to the profit and loss account and recognised in the Statement of Comprehensive Income. Any unreaslied gains or subsequent losses up to the value of those gains previously recognised at the Balance Sheet date are transferred to the revaluation reserve in the Statement of Changes in Equity.

2.9 Debtors

Short-term debtors are measured at transaction price, less any impairment. Loans receivable are measured initially at fair value, net of transaction costs, and are measured subsequently at amortised cost using the effective interest method, less any impairment.

2.10 Cash and cash equivalents

Cash is represented by cash in hand and deposits with financial institutions repayable without penalty on notice of not more than 24 hours. Cash equivalents are highly liquid investments that mature in no more than three months from the date of acquisition and that are readily convertible to known amounts of cash with insignificant risk of change in value.

2.11 Creditors

Short-term creditors are measured at the transaction price. Other financial liabilities, including bank loans, are measured initially at fair value, net of transaction costs, and are measured subsequently at amortised cost using the effective interest method.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

2. Accounting policies continued

2.12 Financial instruments

The Company has elected to apply the provisions of Section 11 "Basic Financial Instruments" of FRS 102 to all of its financial instruments.

The Company has elected to apply the recognition and measurement provisions of IFRS 9 Financial Instruments (as adopted by the UK Endorsement Board) with the disclosure requirements of Sections 11 and 12 and the other presentation requirements of FRS 102.

Financial instruments are recognised in the Company's Balance Sheet when the Company becomes party to the contractual provisions of the instrument.

Financial assets and liabilities are offset, with the net amounts presented in the financial statements, when there is a legally enforceable right to set off the recognised amounts and there is an intention to settle on a net basis or to realise the asset and settle the liability simultaneously.

Basic financial assets

Basic financial assets, which include trade and other debtors, cash and bank balances, are initially measured at their transaction price (adjusted for transaction costs except in the initial measurement of financial assets that are subsequently measured at fair value through profit and loss) and are subsequently carried at their amortised cost using the effective interest method, less any provision for impairment, unless the arrangement constitutes a financing transaction, where the transaction is measured at the present value of the future receipts discounted at a market rate of interest.

Discounting is omitted where the effect of discounting is immaterial. The Company's cash and cash equivalents, trade and most other debtors due with the operating cycle fall into this category of financial instruments.

Other financial assets

Other financial assets, which includes investments in equity instruments which are not classified as subsidiaries, associates or joint ventures, are initially measured at fair value, which is normally the recognised transaction price. Such assets are subsequently measured at fair value with the changes in fair value being recognised in the profit or loss. Where other financial assets are not publicly traded, hence their fair value cannot be measured reliably, they are measured at cost less impairment.

Impairment of financial assets

At the end of each reporting period financial assets measured at amortised cost are assessed for objective evidence of impairment. If an asset is impaired the impairment loss is the difference between the carrying amount and the present value of the estimated cash flows discounted at the asset's original effective interest rate. The impairment loss is recognised in profit or loss.

Financial assets are impaired when events, subsequent to their initial recognition, indicate the estimated future cash flows derived from the financial asset(s) have been adversely impacted. The impairment loss will be the difference between the current carrying amount and the present value of the future cash flows at the asset(s) original effective interest rate.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

2. Accounting policies continued

2.12 Financial instruments continued

If there is a favourable change in relation to the events surrounding the impairment loss then the impairment can be reviewed for possible reversal. The reversal will not cause the current carrying amount to exceed the original carrying amount had the impairment not been recognised. The impairment reversal is recognised in the profit or loss.

Financial liabilities

Financial liabilities and equity instruments are classified according to the substance of the contractual arrangements entered into. An equity instrument is any contract that evidences a residual interest in the assets of the Company after the deduction of all its liabilities.

Basic financial liabilities, which include trade and other creditors, bank loans and other loans are initially measured at their transaction price (adjusting for transaction costs except in the initial measurement of financial liabilities that are subsequently measured at fair value through profit and loss). When this constitutes a financing transaction, whereby the debt instrument is measured at the present value of the future payments discounted at a market rate of interest, discounting is omitted where the effect of discounting is immaterial.

Debt instruments are subsequently carried at their amortised cost using the effective interest rate method. Trade creditors are obligations to pay for goods and services that have been acquired in the ordinary course of business from suppliers. Trade creditors are classified as current liabilities if the payment is due within one year. If not, they represent non-current liabilities. Trade creditors are initially recognised at their transaction price and subsequently are measured at amortised cost using the effective interest method. Discounting is omitted where the effect of discounting is immaterial.

Other financial instruments

Derivatives, including forward exchange contracts, futures contracts and interest rate swaps, are not classified as basic financial instruments. These are initially recognised at fair value on the date the derivative contract is entered into, with costs being charged to the profit or loss. They are subsequently measured at fair value with changes in the profit or loss.

Debt instruments that do not meet the conditions as set out in FRS 102 paragraph 11.9 are subsequently measured at fair value through the profit or loss. This recognition and measurement would also apply to financial instruments where the performance is evaluated on a fair value basis as with a documented risk management or investment strategy.

Derecognition of financial instruments

Derecognition of financial assets

Financial assets are derecognised when their contractual right to future cash flow expire, or are settled, or when the Company transfers the asset and substantially all the risks and rewards of ownership to another party. If significant risks and rewards of ownership are retained after the transfer to another party, then the Company will continue to recognise the value of the portion of the risks and rewards retained.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

2. Accounting policies continued

2.12 Financial instruments continued

Derecognition of financial liabilities

Financial liabilities are derecognised when the Company's contractual obligations expire or are discharged or cancelled.

2.13 Foreign currency translation

Functional and presentation currency

The Company's functional and presentational currency is GBP.

Transactions and balances

Foreign currency transactions are translated into the functional currency using the spot exchange rates at the dates of the transactions.

At each period end foreign currency monetary items are translated using the closing rate. Non- monetary items measured at historical cost are translated using the exchange rate at the date of the transaction and non-monetary items measured at fair value are measured using the exchange rate when fair value was determined.

Foreign exchange gains and losses resulting from the settlement of transactions and from the translation at period-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in profit or loss except when deferred in other comprehensive income as qualifying cash flow hedges.

Foreign exchange gains and losses that relate to borrowings and cash and cash equivalents are presented in the Statement of Comprehensive Income within 'finance income or costs'. All other foreign exchange gains and losses are presented in profit or loss within 'other operating income'.

3. Employees

	2025 £'000	2024 £'000
Wages and salaries	189	92

The average monthly number of employees, including directors, during the year was 4 (2024 - 4).

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

4. Investments in trading entities

	Investments £'000
Cost	
At 1 October 2024	324,264
Additions	197,375
Disposals	(45,417)
Revaluations	748
At 30 September 2025	**476,970**
Impairment	
At 1 October 2024	48,557
Charge for the period	21,542
At 30 September 2025	**70,099**
Net book value	
At 30 September 2025	547,069
At 30 September 2024	372,821

Since the Balance Sheet date, the Company has purchased further investments in trading entities totaling £38,160,129.

5. Debtors

	2025 £'000	2024 £'000
Due within one year		
Trade debtors	1,053	2,723
Other debtors	16,967	6,794
Prepayments and accrued income	1,884	1
	19,904	**9,518**

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

5. Debtors continued

	2025 £'000	2024 £'000
Due after more than one year		
Other debtors	1,238	4,978

6. Cash and cash equivalents

	2025 £'000	2024 £'000
Cash at bank and in hand	27,505	39,032

7. Creditors

Due within one year	2025 £'000	2024 £'000
Other loans (note 8)	141	–
Trade Creditors	26	–
Other creditors	582	864
Accruals and deferred income	3,390	2,166
	4,139	**3,030**

Due after more than one year	2025 £'000	2024 £'000
Other loans	70,942	–
	70,942	**–**

Since the Balance sheet date, the Company has repaid current and non-current loans totalling £48,338,855.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

8. Loans

Analysis of the maturity of loans is given below:

	2025 £'000	2024 £'000
Amounts falling due within one year		
Other loans	141	–
Amounts falling due 1-2 years		
Other loans	22,460	–
Amounts falling due 2-5 years		
Other loans	48,482	–
	71,073	–

9. Share capital

	2025 £'000	2024 £'000
Allotted, called up and fully paid		
340,825,500 (2024 – 287,848,538) Ordinary shares of £0.01 each	3,408	2,878

During the year the Company issued 53,141,059 (2024 – 17,649,775) shares at an average price of 151.3 (2024 – 146.1) pence per share.

Since the Balance Sheet date the company issued 76,360,345 (2024 – 24,518,371) new shares at an average price of 153.8 (2024 – 147.7)

10. Guarantees

The Company has guaranteed bank borrowings by fixed charges and containing a negative pledge over the assets of the Company. At the year end the carrying amount covered by these guarantees totalled £35,566,021 (2024 - £32,009,560).

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

11. Related party transactions

During the year fees of £8,811,726 (2024 - £5,970,151) were payable to the Manager of the Company. Included within creditors at the Balance Sheet date is an amount of £2,322,166 (2024 - £1,862,522) in relation to fees due to the Manager.

During the year the Company made net withdrawals of £3,224,065 (2024 - £27,596,296) to a partnership in which it has a controlling interest. At the Balance Sheet date the Company had an interest of £Nil (2024 - £3,224,064) in this partnership.

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

Glossary of Key Terms

Term	Description
BESS	Battery Energy Storage System
BR	Business Relief
CfD	The Contract for Difference is a government backed revenue mechanism that guarantees generators a fixed, inflation-linked strike price for electricity by providing two way payments against the wholesale market price, thereby stabilising long-term income for low-carbon projects.
Company	Bagnall Energy Limited
Compound annual NAV return	This is the change in the Net Asset Value from 28 February 2013 to 30 September 2025.
ESG	Environmental, Social and Governance
FiT	The Feed-in-Tariffs (FIT) scheme is a government programme designed to promote the uptake of renewable and low-carbon electricity generation technologies. Introduced on 1 April 2010, the scheme requires participating licensed electricity suppliers to make payments on both generation and export from eligible installations. The FIT scheme closed to new applications from 1 April 2019.
GO	Guarantee of Origin certificate
Manager	Downing LLP
MWh	Unit of energy
MWp	A rating for the peak power capacity of a system
NAV	Net Asset Value
NIRO	Northern Ireland Renewables Obligation
Portfolio	The assets in which the Company had an equity or debt interest as at 30 September 2025
PPA	Power Purchase Agreement
REGO	Renewable Energy Guarantee of Origin certificates
RO	The Renewable Obligation is one of the main support mechanisms for large-scale renewable electricity projects in the UK. It places an obligation on UK electricity suppliers to source an increasing proportion of the electricity they supply from renewable sources. The RO scheme closed to new applicants on 31 March 2017.
Total annual NAV return	This is the change in the Net Asset Value from 1 October 2024 to 30 September 2025

Docusign Envelope ID: BFC8E023-20AA-46DB-BC9A-4D99BBB20C27

April 2026

10 Lower Thames
Street London EC3R 6AF

020 7416 7780
customer@downing.co.uk
www.downing.co.uk

Produced by:
perivan
perivan.com

Appendix C: Q7.3.4 Example Terms of Reference for a Community Liaison Group

Community Liaison Group

Draft Terms of Reference

The group would facilitate conversation between residents, local authorities and other local interested stakeholders in relation to the construction of the project.

Purpose

The overarching role of a CLG would be to encourage and facilitate formal communications between the developer and local stakeholders during the construction of the project. The CLG would help to ensure that the project team understands the views of the community and would provide an opportunity for the local community to share their insights and to be provided with timely updates about the project. The CLG is a consultative and advisory forum. It would not have decision-making powers in relation to the construction or operation of the Project.

CLG Chair

The project would explore the possibility of appointing an independent chair. The CLG may also appoint administrative support to assist the Chair and the operation of the CLG. Subject to the agreement of the CLG, both roles would be reviewed annually and may be rotated on an annual basis.

Membership of the CLG

Membership would be confirmed at its first meeting and reviewed periodically. Membership may include [elected members of local authorities, local authority officers, parish council representatives, community groups, relevant statutory stakeholders]. It would also include representatives of the Applicant and its construction team.

Duties and scope of work of the CLG

The CLG would provide a platform for discussions and would be a place where a range of issues can be discussed relating to the project's construction. The project team would provide updates on works carried out on site and scheduled for the near future. CLG members would be able to comment and provide recommendations to the project team on future activities and communications. All actions taken by the project team that were informed by these discussions would be reported back to the group.

The CLG members would be expected to:

a. Participate in group discussion on the project's progress and help shape communication frequency, format and content.

b. Suggest and nominate members to join the CLG.

c. Encourage engagement and reporting of the Community Benefit Fund, which would come forward at the same time (but would be administered through separate governance arrangements).

d. Fulfil the obligation set out in the DCO for community liaison and embrace the spirit of full engagement.

Frequency and location of CLG meetings

The expectation would be for the CLG to meet at least quarterly. However, the group would be able to set its own meeting schedule. The location of each meeting would be agreed by the group, but would be likely to rotate locations in the local area to ensure fairness for all attendees.

The organisation and management of CLG meetings

The organisation and management of CLG meetings would be discussed and agreed but would be expected to follow these broad principles:

a. Relevant materials, communications and correspondence would be distributed to all members in a timely manner.

b. The CLG would initially meet quarterly and may, as a group, decide to alter the frequency of meetings as appropriate.

c. Invitations would be circulated within an agreed number of working days before each meeting. Any additional, time sensitive meeting invites would also be circulated an agreed number of days before.

d. Agendas would be circulated within an agreed number of working days before each meeting.

e. Meeting access links (where meetings are held online) would be circulated within an agreed period of time before the meeting.

f. Notes from meetings would be circulated to all CLG members and any other interested stakeholders within an agreed number of working days following the meeting taking place.

g. CLG members would be invited to add agenda items for discussion ahead of each meeting – this would be expected to take place at the end of each meeting.

Reporting the CLG's work

CLG meetings would be organised around an agenda circulated to members in advance of every meeting. Draft minutes would be circulated to members for comment following each meeting and approved by the CLG members at the following meeting.

It is expected that the approved minutes of every meeting would be published on the project website for anyone to review and to raise through their community's representative on the CLG.

House rules

There would be a set of house rules that CLG members would be expected to adhere to and respect. Examples of these include:

a. All participants must listen to and treat members' views and opinions with respect.

b. Members must raise their hand if they wish to speak (use raise hand function if meeting online using Microsoft Teams).

c. Members must not speak over each other (remain on mute until asked to speak if meeting online).

d. The CLG would enable public discussion. The purpose would be to hear the many points of view and explore options and solutions.

Review of the Terms of Reference

These Terms of Reference would be reviewed periodically by the CLG and may be amended with the agreement of the CLG and the project team.

Appendix D: Q12.0.4 Scheduled Monument Buffer

DRAFT

Queen's Bank
Jalna
Farrows Farm
Moulton East Fen
Yew Lodge Farm
Gull
St Guthlac's Lodge
Queen's Bank Farm
1002944
Providence House
1009980
1004978
Edgefield House
Poplartree Farm
1004979
Eaugate
Martins Farm
Martins Road
Hemels House
Growland
Sparling
Whipchicken Farm
Decoy Farm
Thornbury Hall
Road
Station House
Cedar Lodge
Postland House
Postland Cottages
B1166
Hull's Drove
Woodbine Lodge
0 250 500 750 1,000 m

Project Title
Meridian Solar Farm

Map Title
Applicant's Responses to the Examining Authority's First Written Questions - Question 12.0.4

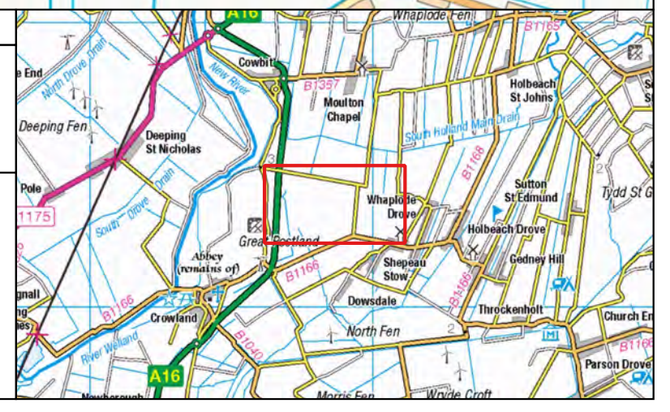
Scale @ A3	Version	Drawn	Reviewed
1:12000	1.0	BH	FL

Legend
- Order Limits
- Scheduled Monuments
- 20m Buffer
- Fence
- Solar Panels
- Solar Station

Date: 15/10/2026

Copyright:
Contains OS data © Crown Copyright and database right 2025 Contains data from OS Zoomstack

Meridian Solar



DRAFT

White House Farm
Marsh
Sunnyfield House
Hill Marsh Farm
Marsh House Farm
Cowhirne Cottage
Bass Cottages
Flints Farm
Stone
Lord's Drain
River Welland
St Lamberts
1019096
Wykeham
The Chase
Gate
Wykeham Lane
Gate
Wiseman's
Stumps Lane
Gate
The Cottage
White House Farm
A151
1013529
Road
Drove
Weston
Cross
Small
High
Sycamore Farm
High Road
West
Cobgate Farm
Festival

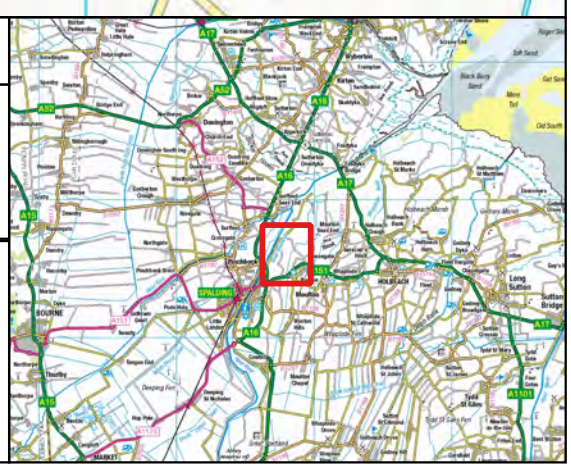
Project Title: Meridian Solar Farm			
Map Title: Applicants Responses to the Examining Authority's First Written Questions - Question 12.0.4			
Scale: 1:12000	Version: 1.0	Drawn: BH	Reviewed: FL

Legend
- Order Limits
- Scheduled Monuments
- 20m Buffer
- Limit of Deviation

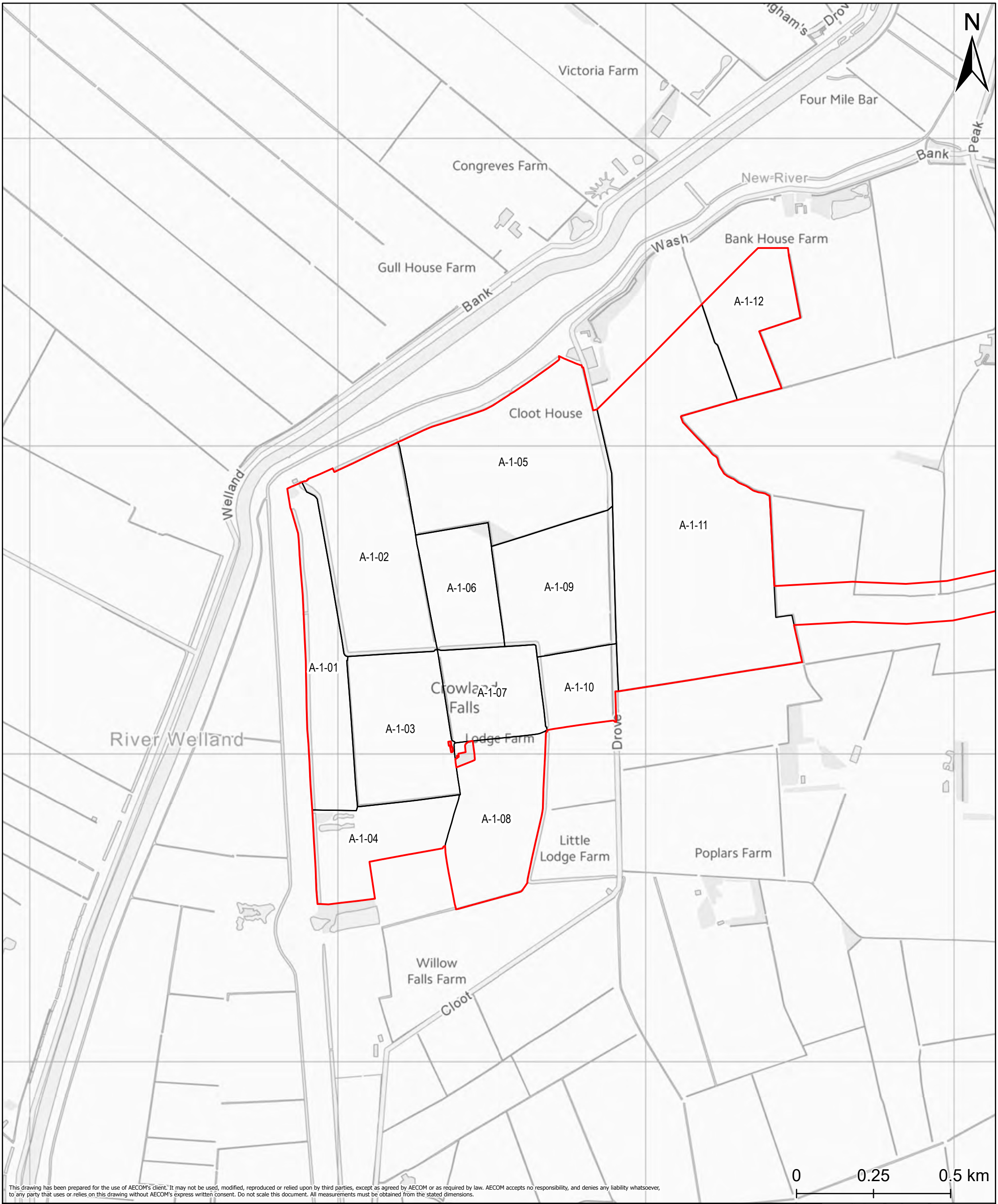
Date: 19/10/2026

Copyright:
Contains OS data © Crown Copyright and database right 2025 Contains data from OS Zoomstack

Meridian Solar



Appendix E: Q14.0.1 Cropping Information Figure



This drawing has been prepared for the use of AECOM's client. It may not be used, modified, reproduced or relied upon by third parties, except as agreed by AECOM or as required by law. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that uses or relies on this drawing without AECOM's express written consent. Do not scale this document. All measurements must be obtained from the stated dimensions.

Project Title

Meridian Solar Farm

Map Title

Figure Q14.0.1: Examining Authority's Written Questions 1- Parcel A
Page 1 of 4

Scale	Version	Drawn	Reviewed
1:11,000	0	AD	AT

Legend

Order Limits

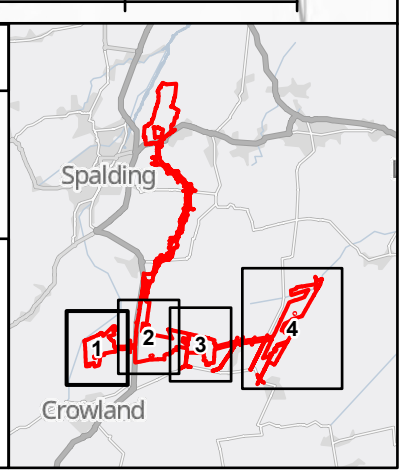
Crops Benefiting from Irrigation

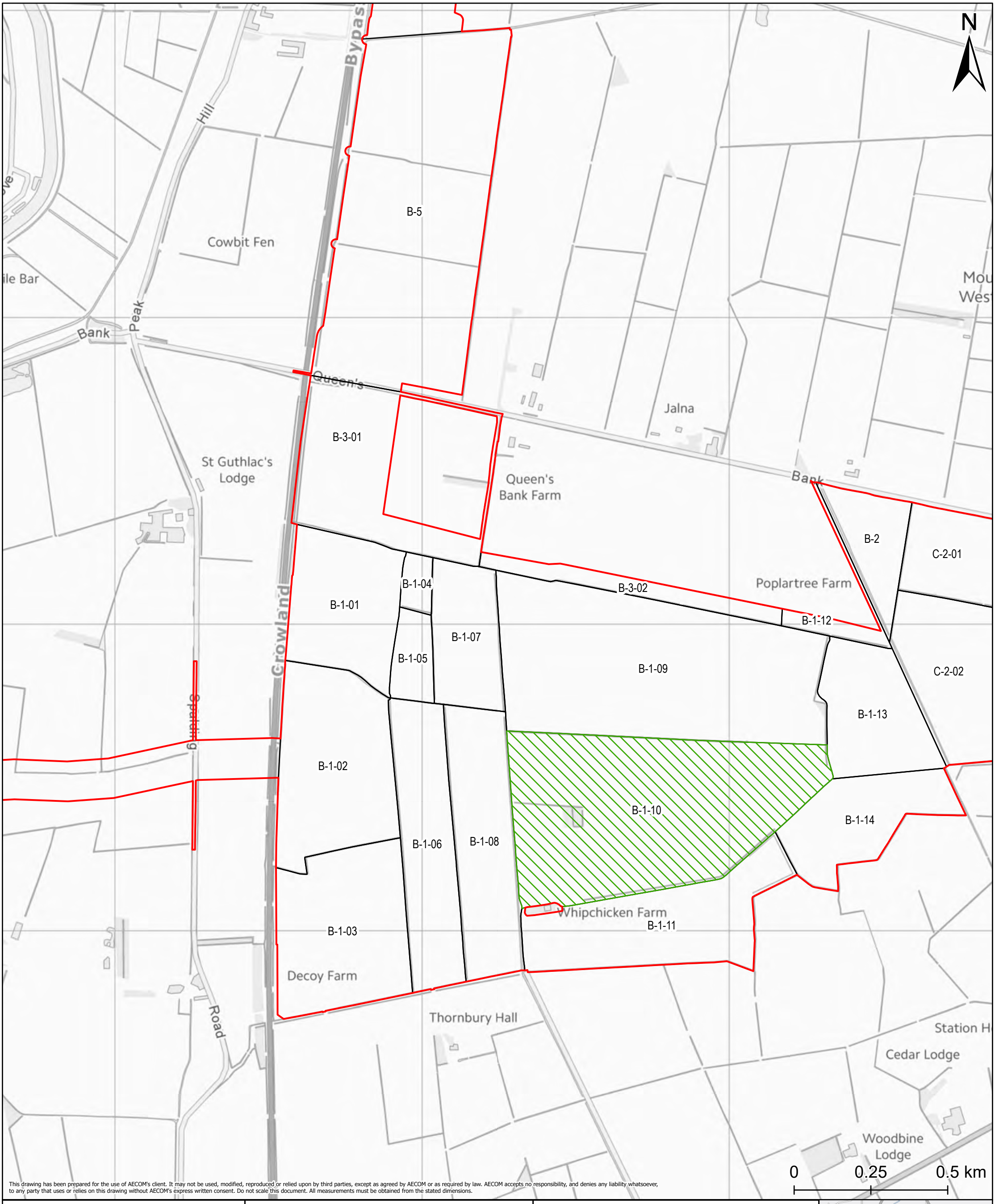
Cropped land not requiring irrigation 2023-2026

Date: 22/10/2026

Copyright
Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack, Contains OS data © Crown copyright 2025. Reproduced from Ordnance Survey digital map data © Crown copyright 2025. All rights reserved. Licence number AC0000808122.

Meridian Solar





This drawing has been prepared for the use of AECOM's client. It may not be used, modified, reproduced or relied upon by third parties, except as agreed by AECOM or as required by law. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that uses or relies on this drawing without AECOM's express written consent. Do not scale this document. All measurements must be obtained from the stated dimensions.

Project Title

Meridian Solar Farm

Map Title

Figure Q14.0.1: Examining Authority's Written Questions 1- Parcel A
Page 1 of 4

Scale	Version	Drawn	Reviewed
1:11,000	0	AD	AT

Legend

Order Limits

Crops Benefiting from Irrigation

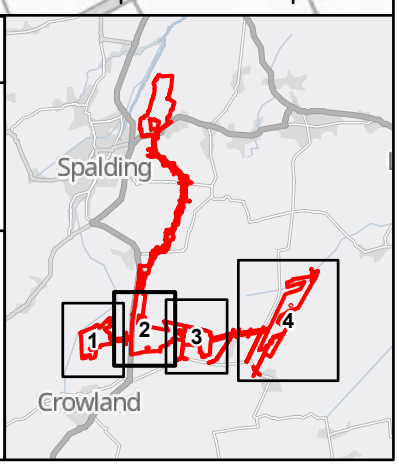
Cropped land not requiring irrigation 2023-2026

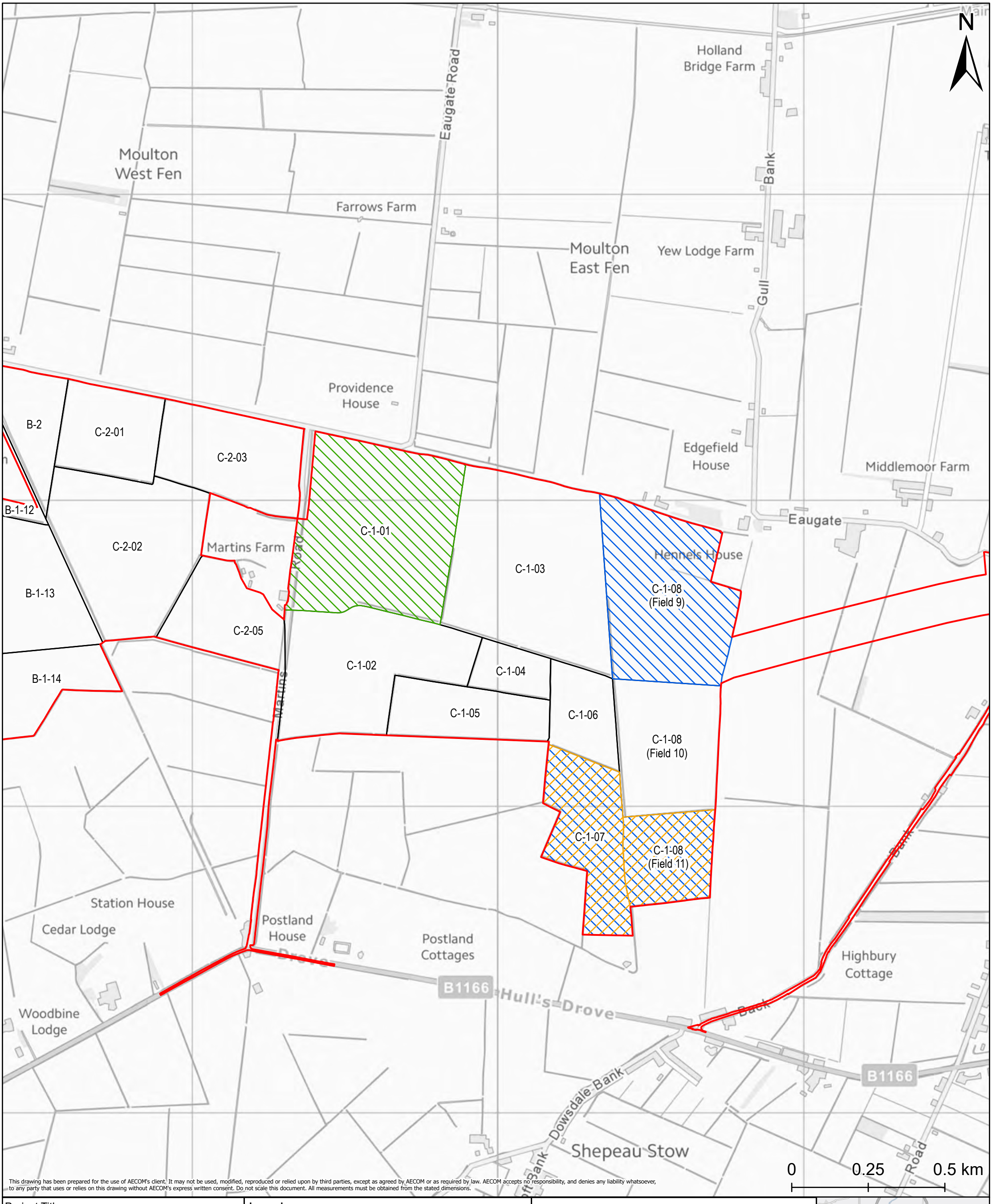
Irrigated Crops 2023

Date: 22/10/2026

Copyright
Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack, Contains OS data © Crown copyright 2025. Reproduced from Ordnance Survey digital map data © Crown copyright 2025. All rights reserved. Licence number AC0000808122.

Meridian Solar





This drawing has been prepared for the use of AECOM's client. It may not be used, modified, reproduced or relied upon by third parties, except as agreed by AECOM or as required by law. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that uses or relies on this drawing without AECOM's express written consent. Do not scale this document. All measurements must be obtained from the stated dimensions.

Project Title

Meridian Solar Farm

Map Title

Figure Q14.0.1: Examining Authority's Written Questions 1- Parcel A
Page 1 of 4

Scale	Version	Drawn	Reviewed
1:11,000	0	AD	AT

Legend

- Order Limits

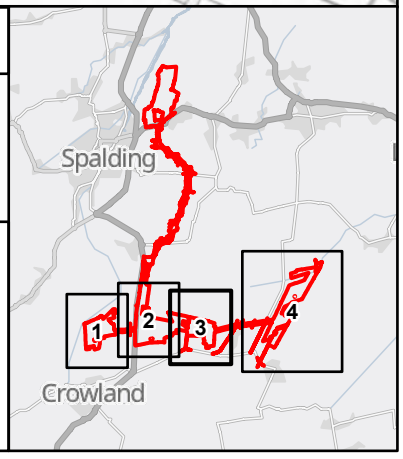
Crops Benefiting from Irrigation

- Cropped land not requiring irrigation 2023-2026
- Irrigated Crops 2023
- Irrigated Crops 2024
- Irrigated Crops 2026

Date: 22/10/2026

Copyright
Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack, Contains OS data © Crown copyright 2025. Reproduced from Ordnance Survey digital map data © Crown copyright 2025. All rights reserved. Licence number AC0000808122.

Meridian Solar



D-1-01
D-1-02
D-1-03
D-2-01
D-2-02
D-2-03
D-2-04
D-3-01
D-3-02
D-3-03
D-3-04
D-3-05
D-3-06
D-4
D-5-01
D-5-02
D-6
D-8

This drawing has been prepared for the use of AECOM's client. It may not be used, modified, reproduced or relied upon by third parties, except as agreed by AECOM or as required by law. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that uses or relies on this drawing without AECOM's express written consent. Do not scale this document. All measurements must be obtained from the stated dimensions.

0 0.25 0.5 km

Project Title

Meridian Solar Farm

Map Title

Figure Q14.0.1: Examining Authority's Written Questions 1- Parcel A
Page 1 of 4

Scale	Version	Drawn	Reviewed
1:18,000	0	AD	AT

Legend

Order Limits

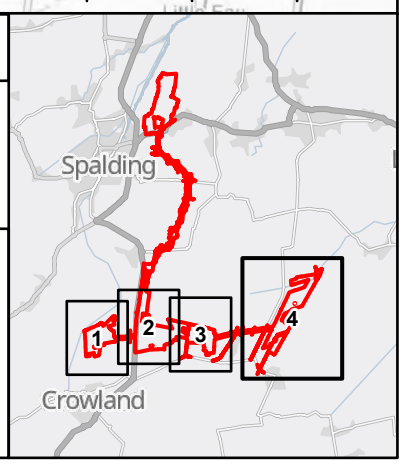
Crops Benefiting from Irrigation

Cropped land not requiring irrigation 2023-2026

Date: 22/10/2026

Copyright
Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack, Contains OS data © Crown copyright 2025. Reproduced from Ordnance Survey digital map data © Crown copyright 2025. All rights reserved. Licence number AC0000808122.

Meridian Solar



Appendix F: Q16.0.1 National Grid Technical Report TR(E)564 (2021)

DEVELOPMENT OF METHOD FOR ASSESSING THE IMPACT OF NOISE FROM OVERHEAD LINES (NEW BUILD, RECONDUCTORING, DIVERSION AND UPRATING)

This document is for internal use only.

Disclaimer
NGG and NGET or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements."

TABLE OF CONTENTS

PURPOSE AND SCOPE....1
PART 1 – WHY NOISE CRITERIA ARE REQUIRED....2
1 OVERVIEW....2
2 OVERHEAD LINE NOISE....2
3 UK NOISE POLICY....2
4 GUIDANCE DOCUMENTS....3
5 EVIDENCE FOR HEALTH EFFECTS....4
PART 2 – SETTING CRITERIA....7
6 OVERVIEW....7
7 DISCUSSION....8
8 CRITERIA FOR RESIDENTIAL PROPERTIES....8
9 CRITERIA FOR VULNERABLE SUBGROUPS....9
10 CRITERIA FOR SCHOOLS....10
11 CRITERIA FOR HOTLES....11
PART 3 – PRACTICAL APPLICATION OF NOISE CRITERIA....11
12 OHL VOLTAGE....111
13 TIERED ASSESSMENT APPROACH....111
14 DEVELOPMENT CONSENT ORDER....122
15 EFC400 OUTPUTS....122
PART 4 – COMPARISON WITH PREVIOUS APPROACH TO OHL NOISE ASSESSMENT....13
16 OVERVIEW....133
17 DCO APPLICATIONS....133
PART 5 - DEFINITIONS AND DOCUMENT HISTORY....155
18 FORMS AND RECORDS....155
19 DEFINITIONS....155
20 AMENDMENTS RECORD....155
21 IMPLEMENTATION....155
PART 6 - GUIDANCE NOTES AND APPENDICES....155
APPENDIX A – SUMMARY OF EVIDENCE FOR EFFECTS DUE TO NOISE....166

PURPOSE AND SCOPE

This report documents the need for a clear policy stance on acceptable noise levels from overhead lines and explains how those noise levels, which are presented in PS(T)134[1] were developed.

There are currently no European or UK national noise limits which have to be met. Acceptable noise levels have to be developed by policy makers for different noise generating uses. National Grid Electricity Transmission (NGET) has not had a firm, documented policy stance on acceptable noise levels from overhead lines. Historically, noise criteria have been developed on a project specific basis for Development Consent Order (DCO) applications, but no such criteria existed for internal overhead line (OHL) noise assessments. This has led to a lack of consistency in terms of acceptable noise levels and the standard of noise mitigation required across different overhead line schemes.

[1] Operational audible noise policy for overhead lines (new build, reconductoring, diversion and uprating).

A firm policy stance is required to ensure a clear, consistent approach across schemes, an efficient use of funds for noise mitigation, to provide a clear audit trail regarding our decision-making process and to ensure our decisions are defendable.

PART 1 – WHY NOISE CRITERIA ARE REQUIRED

1 OVERVIEW

Overhead transmission lines can produce audible noise in operation during both dry and wet weather conditions. The noise can be annoying, disturbing and intrusive for people nearby.

As a socially and environmentally responsible business, National Grid is committed to the protection and enhancement of the environment and communities in which we operate. Our aim is to minimise the impact of noise pollution from our overhead lines on noise sensitive receptors (NSR's).

We also have a responsibility to ensure we do not cause a Statutory Noise Nuisance under the Environmental Protection Act 1990. Additionally, where Planning or Development Consent is required for a project, we have to predict and document the impact of noise from the operation of the overhead line on NSR's.

Whilst there are no fixed noise limits laid down by law, government noise policy requires that significant adverse impacts on health and quality of life are avoided and adverse impacts on health and quality of life are mitigated and minimised. The approach to the assessment of noise from our OHL's has been developed taking account of this government policy context.

2 OVERHEAD LINE NOISE

Overhead transmission lines can produce audible noise in operation during both dry and wet weather conditions.

Noise which occurs during dry weather conditions is referred to as 'Dry Noise' and can be described as a crackle. Conductor system noise is caused by corona discharge activity. Most transmission line conductors are designed to operate below the threshold for corona discharge activity, and so usually operate quietly in dry weather conditions. However, small areas of surface contamination on conductors can lead to a local enhancement of electrical stress and cause corona discharge and hence noise to occur.

Noise which occurs during wet weather conditions is referred to as 'Wet Noise' and can be described as a crackle, which is sometimes accompanied by a hum, which usually occurs at 100Hz and may be accompanied by harmonics, typically at 200Hz, 300Hz, or 400 Hz. The highest noise levels generated by an overhead line generally occur during rainfall. Water droplets may accumulate on the surface of the conductor and initiate multiple corona discharges. The number of droplets, and hence the noise level, will depend primarily on the rate of rainfall. Fog may also give rise to increased noise levels, although these levels are less than those during rain. Historical studies determined that hum inception typically occurs at a rainfall rate of approximately 1mm/hr[2]. Noise generated under these circumstances is referred to as 'wet noise'.

3 UK NOISE POLICY

The UK Policy context is very clear that significant adverse impacts on health and quality of life should be avoided and adverse impacts on health and quality of life should be mitigated and minimised.

[2] Studies at Bramley referenced in TR(T)94 'A method for assessing the community response to overhead line noise'.

Noise Policy Statement for England[3] (NPSE)

The NPSE sets out the long-term vision of Government noise policy. The aims of the policy are to:

- Avoid significant adverse impacts on health and quality of life,
- Mitigate and minimise adverse impacts on health and quality of life and,
- Where possible, contribute to the improvement of health and quality of life.

National Planning Policy Framework[4] (NPPF)

The NPPF sets out the Government's planning policies for England. The NPPF states that planning policies and decisions should:

- Avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development;
- Mitigate and reduce to a minimum, potential adverse impacts on health and quality of life arising from noise from new development; and
- Identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

National Policy Statement EN-1[5] (NPS EN-1)

NPS EN-1 sets out national policy (England and Wales) for energy infrastructure where development consent is sought under the Planning Act 2008. EN-1 states that the Infrastructure Planning Commission should not grant development consent unless it is satisfied that the proposal will:

- Avoid significant adverse impacts on health and quality of life from noise;
- Mitigate and minimize other adverse impacts on health and quality of life from noise; and
- Where possible, contribute to improvements to health and quality of life through effective management and control of noise.

4 GUIDANCE DOCUMENTS

In addition to the UK policy context, other documents offer guidance on the approach to noise assessment and on threshold levels, above which noise can impact on health and quality of life.

The World Health Organisation (WHO) Guidelines[6] set out guideline values for the onset of health effects from noise exposure. They offer little guidance on acceptable noise levels where the noise contains a large proportion of low frequency components typical of overhead line hum in wet weather conditions, simply stating that application of a lower guideline value is recommended.

[3] 'Noise Policy Statement for England', Department for Environment Food and Rural Affairs, March 2010
[4] 'National Planning Policy Framework', Department for Communities and Local Government, March 2012
[5] EN-1 'Overarching National Policy Statement for Energy', Department of Energy and Climate Change, July 2011
[6] 'Guidelines for Community Noise', World Health Organisation, 1999

The Night Noise Guidelines for Europe[7] document observed effect threshold levels for noise at night (based mainly on evidence relating to traffic noise), this being the level of noise above which an effect starts to occur. Such effects include impacts on sleep quality, wellbeing and specific medical conditions.

BS 8233[8] sets out internal noise criteria for bedrooms during the day and night and for living and dining rooms during the day; the standard also sets out external noise criteria for gardens. The noise criteria presented in BS 8233 are based on the guidance contained in the WHO Guidelines and therefore offer little guidance in relation to low frequency noise, other than to state that lower limits might be appropriate.

ProPG: Planning & Noise[9] provides guidance on a recommended approach to the management of noise within the planning system in England. It aims to encourage better acoustic design for new residential development and to protect people from the harmful effects of noise. It sets out internal noise criteria for bedrooms during the day and night and for living and dining rooms during the day.

Under Part III of the Environmental Protection Act 1990[10], noise emitted from a premises, which is prejudicial to health or a nuisance, can be declared a Statutory Nuisance. In such circumstances, a Local Authority can serve an Abatement Notice on the responsible party. Failure to comply with the Notice is a criminal offence and could lead to prosecution and costly mitigation actions.

BS 4142[11] sets out a method for assessing the impact of sound from a proposed new noise source on residential premises. The standard also offers guidance on the application of a decibel penalty where the noise has a distinguishing character, such as if the noise is tonal, impulsive, intermittent or has other distinguishing features.

These guidance documents have been used to aid the formulation of an approach to assessing the impact of noise from OHL's and in the development of noise criteria to uphold the current UK Noise Policy requirements.

5 EVIDENCE FOR HEALTH EFFECTS

The NPSE introduces the concepts of the No Observed Effect Level (NOEL), the Lowest Observed Adverse Effect Level (LOAEL) and the Significant Observed Adverse Effect Level (SOAEL) with regard to noise. The NOEL is defined as the level below which no effect can be detected, below this level there is no detectable effect on health and quality of life. The LOAEL is defined as the level above which adverse effects on health and quality of life can be detected. The SOAEL is defined as the level above which significant adverse effects on health and quality of life occur and is likely to be different for different noise sources and receptors and at different times of day.

The guidance in the NPSE aids the interpretation of evidence relating to health impacts due to noise and what may constitute an adverse and a significant adverse impact.

[7] Night Noise Guidelines for Europe, World Health Organisation, 2009

[8] BS 8233: 2014 'Guidance on sound insulation and noise reduction for buildings', British Standards Institution, February 2014

[9] ProPG: Planning & Noise, Professional Practice Guidance on Planning and Noise, New Residential Development, May 2017

[10] Environmental Protection Act 1990

[11] BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound', British Standards Institution, June 2019

Health and Quality of Life

UK Policy requires that significant adverse impacts on health and quality of life are avoided and adverse impacts on health and quality of life are mitigated and minimised.

The WHO defines 'health' as a state of complete physical, mental and social well-being. In the NPSE, 'quality of life' is a subjective measure that refers to peoples emotional, social and physical well-being and 'health' refers to physical and mental well-being. The NPSE recognises that noise exposure can cause annoyance and sleep disturbance, both of which impact on quality of life, it is also agreed by experts that annoyance and sleep disturbance can give rise to adverse health effects.

WHO Guidelines for Community Noise

The WHO Guidelines, published in 1999, are noise levels which correspond to the onset of health effects from noise exposure. The noise levels vary depending on the nature of the NSR, time of day, noise indices used and whether the level applies internally or externally.

The levels are set at the lowest level of noise that affects health (critical health effect) i.e. the LOAEL.

The WHO Guidelines state that low frequency noise is likely to lead to more severe health effects than community noise in general. Consequently, for low frequency noise (such as wet weather hum), the WHO recommends values even lower than the guideline values. The WHO does not however give advice on how much lower they should be set.

The WHO Guidelines recommend 5dB lower daytime noise levels for vulnerable subgroups (Hospitals and pre-schools) when compared to residential properties.

The WHO Guidelines specify an $L_{Aeq,8hour}$ (23:00 to 07:00) outside bedrooms of residential properties of 45dBA as being the Critical Heath Effect Level i.e. the LOAEL. The WHO Guidelines provide Critical Health Effect Levels for many other uses and times of day, including, outdoor living areas, schools, pre-schools, playgrounds, hospitals and industrial/commercial type uses. A list of WHO Guideline levels are presented in Appendix A.

Night Noise Guidelines for Europe (NNGE)

The NNGE were published by the WHO in 2009. They are an extension to, and update of, the WHO Guidelines for Community Noise. The NNGE document reviews the epidemiological and experimental studies into health effects of night time noise exposure, it examines exposure-effects relationships and presents health-based guideline values to prevent harmful effects of night noise in Europe. The values from the NNGE are summarised in Table 1.

The NNGE are based on observed effect threshold levels i.e. the level above which effects start to occur. The majority of research evaluated in the NNGE and on which the guideline values are based relates to traffic noise data.

The NNGE give details of a range of effects on health and quality of life, such as biological effects, effects on sleep quality, well-being and medical effects of exposure to night noise and the level of noise at which those corresponding effects occur.

Table 1: NNGE Effects of different levels of night noise on the population's health[12]

Average night noise level over a year $L_{night,outside}$	Health effects observed in population
Up to 30dB	Up to this level no substantial biological effects are observed. $L_{night,outside}$ of 30dB is equivalent to the NOEL for night noise.
30 to 40dB	A number of effects on sleep are observed. The intensity of effect depends on the nature of the source and number of events. Vulnerable subgroups (e.g. children, chronically ill and elderly) are more susceptible. However, even in the worst cases the effects seem modest. $L_{night,outside}$ of 40dB is equivalent to the LOAEL for night noise.
40 to 55dB	Adverse health effects are observed. Many people have to adapt their lives to cope with the noise. Vulnerable subgroups are more severely affected.
Above 55dB	Increasingly dangerous for public health. Adverse health effects occur frequently. A sizeable proportion of the population is highly annoyed and sleep-disturbed. There is evidence that the risk of cardiovascular disease increases.

BS 8233: Guidance on sound insulation and noise reduction for buildings

BS 8233 outlines internal night time noise criteria in bedrooms of 30dB $L_{Aeq,8\ hour}$. Assuming 15dB attenuation for an open window would result in an external level of 45dB $L_{Aeq,8\ hour}$ which correlates with the WHO Guidelines for community noise on which BS 8233 is based. BS 8233 states that where the noise has strong low-frequency content (such as wet weather hum), lower noise limits might be more appropriate, no guidance is given on how much lower. A list of BS 8233 levels are presented in Appendix A.

ProPG: Planning & Noise

The ProPG states that an external Night time LAeq,8hour of less than 40dB is equivalent to no adverse effect, whilst as the noise increases above 40dB there is an increasing risk of an adverse effect. This correlates with the NNGE. The ProPG recommends internal noise levels based on BS 8233 and states a lower level may be required for low frequency noise but no guidance is given on how much lower.

Dominant industrial/commercial noise is out of scope, but where this type of noise isn't dominant, the guidance can be applied. A list of the ProPG levels are presented in Appendix A.

BS 4142 Methods for Rating and Assessing Industrial and Commercial Sound

BS 4142 compares the existing background L_{A90} in the area to the Rating Noise Level (noise of the sound source plus any correction for the character of the noise). The standard states:

[12] The SOAEL is not defined in Table 1 as the SOAEL is a concept developed for the NPSE to be the level above which significant adverse impacts occur. It is not a concept that is adopted by the WHO.

a) Typically, the greater the difference, the greater the magnitude of the impact.

b) A difference of around +10dB or more is likely to be an indication of a significant adverse impact, depending on the context.

c) A difference of around +5dB is likely to be an indication of an adverse impact, depending on the context.

d) The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.

National Grid Technical Report TR(T)94[13]

TR(T)94 presents a method to assess the potential effects of dry and wet noise from new overhead lines. TR(T)94 does not set specific noise assessment criteria; instead it refers to BS4142:1990 and the subjective response of communities and individuals to changes in noise levels.

PART 2 – SETTING CRITERIA

6 OVERVIEW

The evidence outlined in Part 1, Section 5 and Appendix A of this report has been used in conjunction with the UK policy stance to develop acceptable noise levels for noise from OHL's. The noise criteria developed apply only to new build, reconductoring, diversion and uprating projects as to apply them to existing OHL's would not be practicable. Complaints about noise from existing OHL's are to be dealt with on a case by case basis.

The NPSE states there is a need to integrate consideration of the economic and social benefit of the activity or policy under examination with proper consideration of the adverse environmental effects, including the impact of noise on health and quality of life. When setting noise criteria, the economic and social benefit of electricity transmission and the key role our business plays in the functioning of society has been considered alongside the adverse effects of noise generated by our activities.

The night time period, when people are typically sleeping is the most sensitive period. The criteria have therefore been developed considering the health effects of night time noise. The exception to this is NSR use types that are not used at night, in which case the criteria have been developed considering daytime health impacts. The time of day or night is not a factor in how noisy an OHL is at any particular time. Therefore, if the noise from the OHL meets the criteria presented in PS(T)134 and TGN(E)322, which are based on the more sensitive night time period, then it will meet the criteria during both the day time and night time periods.

In setting the criteria, the evidence in Part 1, Section 5 and Appendix A of this report was analysed. Health effects were categorised in order of magnitude and corresponding noise levels documented for different NSR's. Evidence was considered in relation to the effect of noise being greater on vulnerable subgroups, in addition to evidence suggesting low frequency noise requires lower limits.

[13] Technical Report TR(T)94 'A method for assessing the community response to overhead line noise'. Issue 1 October 1993 (Withdrawn and superseded by PS(T)134, TGN(E)322 and TR(E)564)

7 DISCUSSION

There are two main approaches to the setting of noise criteria, one being criteria relating to absolute noise levels and the other being criteria set relative to the existing background noise levels in the area. Each has benefits and draw backs.

Criteria relating to absolute noise levels set a clear cut off point above/below which a noise isn't/is acceptable. This has the benefit of applying the same criteria to all receptors in a category, thereby ensuring consistency of approach. It makes the noise assessment process more efficient and less time consuming than setting criteria relative to existing background levels. It has the drawback of applying the same approach regardless of existing noise levels in the area and may potentially underestimate the noise impact in areas with low background noise or overestimate the impact in areas with a high background noise level.

Criteria set relative to background take account of the existing noise climate in the area and how likely it is that a noise will cause an adverse impact. This has the benefit of tailoring the noise criteria to each individual receptor. It has the drawback of being time-consuming to undertake the assessment, has risks of lone working, may overestimate the impact in areas with low background noise levels and does not give clear direction to the business on acceptable levels of noise from OHL's.

To improve the efficiency of the noise assessment process and give clarity to the business on acceptable noise levels, applying criteria that relate to absolute noise levels is considered most appropriate. It is however possible that where predicted noise levels from an OHL exceed the absolute levels, the noise from the OHL may be acceptable depending on the existing background noise levels in the area compared to the predicted noise level from the OHL. For example, in a location close to a road with high levels of traffic noise, the noise from the road may mean the noise from the OHL is inaudible. It would be appropriate therefore where the absolute noise criteria are not met, to determine the impact of the predicted noise due to the OHL relative to existing background noise levels. This thought process led to the development of a three-tier assessment approach, whereby if the Tier 1 criteria are not met, a Tier 2 assessment is carried out and where the Tier 2 criteria are not met, a Tier 3 assessment is carried out.

8 CRITERIA FOR RESIDENTIAL PROPERTIES

The greatest amount of evidence into the impact of noise on health and quality of life relates to residential receptors. The criteria for residential properties applies to places where people sleep at night and includes residential schools.

The WHO Guidelines suggest an external night-time L_{Aeq} of 45dB being the onset for health effects and therefore the LOAEL for residential properties. BS 8233 and ProPG: Planning and Noise suggests an internal night-time L_{Aeq} of 30dB being the LOAEL for residential properties, which assuming an open window gives 15dB attenuation would equate to an external L_{Aeq} of 45dB. The NNGE however suggest an external night time L_{Aeq} of 40dB as being the LOAEL for residential properties. Given the wealth of evidence on which the NNGE are based, 40dB is taken as the LOAEL for residential properties and the basis on which the OHL noise criteria have been developed. Given that this is an annual average, the absolute level can be exceeded at some points, under certain conditions, for example in wet weather conditions.

The evidence on which the NNGE 40dB L_{Aeq} figure was derived related mainly to traffic noise data. Traffic noise is considered anonymous and therefore less annoying and less noticeable than noise with distinctive character or regarded as having 'ownership', such as that generated by OHL's. In dry weather OHL's can crackle and in wet weather they can also hum. It was considered appropriate therefore to set the LOAEL at an even lower level. Most guideline documents recommend lower guideline levels for low frequency noise, but do not offer guidance on how much lower. BS 4142 offers clear guidance on penalties to apply where noise is tonal or has distinguishing features.

For tonal noise, BS 4142 recommends applying character corrections ranging from 2dB to 6dB depending on how perceptible the tone is, or is predicted to be, at the NSR. As a worst case, a penalty of 6dB has been applied to the NNGE of 40dB, giving an acceptable wet noise limit of less than 34dB. This is a worst-case approach because the tonal hum may not be clearly perceptible at the receptor and tonal hum may not be present for the full duration that rainfall occurs.

BS 4142 recommends a penalty of 3dB where the noise is neither tonal, nor intermittent, though otherwise readily distinctive against the residual acoustic environment. Dry noise crackle can be considered to fall into this category and so as a worst case, a penalty of 3dB has been applied to the NNGE of 40dB, giving an acceptable dry noise limit of less than 37dB. This is a worst-case approach because dry noise may not be present all the time.

The NNGE document evidence relating to the levels of noise that cause adverse impacts on health and therefore can equate to being above the LOAEL and in some cases above the SOAEL. The NNGE state that adverse effects on health are observed at noise levels between 40 to 55dB and above 55dB adverse effects occur frequently. Between 40 to 50dB the evidence for adverse health effects is considered sufficient, whilst above 50dB the evidence is limited. Consequently, for the purposes of setting criteria for OHL noise, adverse impacts on health and quality of life are considered to occur between 40 to 50dB, as sufficient evidence for this exists, and significant adverse impacts are considered to occur above 50dB, as the weight of evidence is limited for levels above 55dB. This is a cautious approach. Applying the penalties described above leads to adverse impacts for wet noise between 34 and 44dB and for dry noise between 37 and 47dB. Significant adverse impacts due to wet noise occur above 44dB and for dry noise above 47dB.

Where the absolute noise level criteria set out above are not met, it is necessary to understand how the predicted wet and dry noise levels compare to the existing background noise levels with and without noise from rainfall. The higher the existing background noise level, the lesser the impact of the noise from the OHL. Where background noise levels are high enough, the noise from the OHL is unlikely to have an adverse impact. It is therefore important to consider the absolute levels in the context of the existing noise climate.

BS 4142 advises on the likelihood of a noise causing a significant adverse and an adverse impact. The impact of dry and wet noise on residential properties is in line with the guidance in BS 4142 (wet noise accounts for an increase in background noise due to rainfall) , such that a difference in the rating level compared to the background sound level of +10dB or more is likely to be an indication of a significant adverse impact (depending on the context), a difference of +5dB to +9dB is an indication of an adverse impact, a difference of 0 to +4dB is an indication of a minor impact and a difference <0dB is an indication of a low impact. Consequently, for the purposes of setting criteria for OHL noise, a difference of +10dB is a significant adverse impact, a difference of +5 to +9dB is an adverse impact, a difference of 0 to +4dB may be acceptable depending on context and a difference <0dB is no adverse impact.

9 CRITERIA FOR VULNERABLE SUBGROUPS

Evidence suggests that vulnerable subgroups, such as patients in hospitals and children at pre-schools are more susceptible to health effects due to exposure to noise. The NNGE suggests a LOAEL of 40dB but recognises that vulnerable subgroups are more susceptible to noise than the general population. For the purposes of setting criteria for OHL noise, the criteria developed for residential receivers have been lowered by 5dB, resulting in a 29dB criteria for wet noise and a 32dB criteria for dry noise. Given that the NNGE suggest that even in the worst cases, the effects of night noise ranging from 30-40dB seem modest, the 29dB and 32dB criteria should adequately protect vulnerable subgroups and is considered a cautious approach.

The 5dB reduction has also been applied to the adverse impact criteria, resulting in adverse impacts for wet noise from 29 to 39dB and for dry noise from 32 to 42dB. Similarly, the significant adverse impact criteria have also been reduced, resulting in significant adverse impacts for wet noise above 39dB and for dry noise above 42dB.

As for residential properties, if the absolute noise level criteria are not met, it is necessary to understand how the predicted wet and dry noise levels compare to the existing background noise levels with and without noise from rainfall.

BS4142 was developed for residential properties. However, it can be applied to vulnerable subgroups who can also expect suitable conditions for sleep and rest. It also enables a determination of the impact of the OHL noise relative to the existing background noise levels. Where background noise levels are high, the impact of noise from the OHL will be lower. Guidance suggests vulnerable subgroups are more susceptible to noise and therefore the criteria developed for residential receivers have been lowered by 5dB.

Consequently, for the purposes of setting criteria for OHL noise, a difference of +10dB is a significant adverse impact, a difference of +5 to +9dB is also a significant adverse impact, a difference of 0 to +4dB is an adverse impact and a difference <0dB is no adverse impact.

10 CRITERIA FOR SCHOOLS

The WHO Guidelines state that for schools an indoor L_{Aeq} of 35dB is the onset for effects in relation to speech intelligibility. There is some debate as to whether a partially open window offers 10 or 15dB attenuation. If we assume the worst case, that the level of attenuation is only 10dB, this would equate to an external level of 45dB (but could be as high as 50dB if we assume 15dB attenuation). This would equate to the LOAEL and is considered a cautious approach.

Applying the same penalties of 6dB for wet noise and 3dB for dry noise and taking a very conservative approach assuming 10dB attenuation for an open window gives a LOAEL of 39dB for wet noise and 42dB for dry noise. Below these levels the noise is acceptable. The adverse impact criteria, where there may be impacts on speech intelligibility are set between 39 to 49dB for wet noise and 42 to 52dB for dry noise.

The significant adverse impact criteria are set above 49dB for wet noise and above 52dB for dry noise. Above these levels there is likely to be an adverse effect on speech intelligibility, which could impact on education and is also likely to cause annoyance during playtimes.

As for residential properties and vulnerable subgroups, if the absolute noise level criteria are not met, it is necessary to understand how the predicted wet and dry noise levels compare to the existing background noise levels with and without noise from rainfall. BS4142 was developed for the purposes of assessing sound at dwellings or premises used for residential purposes. However, where the absolute noise criteria are exceeded, it can be used to predict how prevalent the noise from the OHL will be compared to existing background noise levels. Where background noise levels are high, the impact of noise from the OHL will be lower than the absolute predicted noise levels suggest.

The criteria are the same as for residential properties, however, as schools operate during daytime periods, the relevant background noise levels against which to assess the impact of OHL noise are daytime noise levels[14], not night time (as is the case for residential properties).

[14] Some schools may operate during the evening. BS4142 defines the daytime periods as 07:00 to 23:00 hours, allowing flexibility to use professional judgement to choose the relevant time of day to determine existing background noise levels.

11 CRITERIA FOR HOTLES

Hotels are considered noise sensitive as they are places where people sleep. They are however less sensitive than residential properties as they are not permanent residences and people would only typically stay for a few nights. Consequently, the long-term health impact data in the WHO Guidelines and NNGE are less applicable than for residential properties. The risk of short-term sleep disturbance and hence annoyance and complaints are more applicable to this use type.

The WHO Guidelines state that for residential properties an $L_{Aeq,\ 8\ hour}$ of 45dB is the onset for health effects. Applying the same penalties of 6dB for wet noise and 3dB for dry noise, gives a LOAEL of 39dB for wet noise and 42dB for dry noise. Below these levels the noise is acceptable. This is a conservative approach given that hotels are not permanent residences.

The WHO guidelines state that for residential properties, there is evidence for cardiovascular disease above an $L_{Aeq,\ 8\ hour}$ of 50dB. This evidence is based on long term exposure and a few nights spent in a hotel would not lead to these effects. These noise levels could however cause awakenings and therefore annoyance and complaints. As such they correlate with adverse impacts. Applying the penalties for wet and dry noise leads to adverse impact criteria of 44dB for wet noise and 47dB for dry noise.

The WHO Guidelines state that for residential properties, health effects occur frequently and a large proportion of the population are annoyed or sleep disturbed above an $L_{Aeq,\ 8\ hour}$ of 55dB. These noise levels are likely to cause awakenings and therefore annoyance and complaints and should be avoided. Applying the penalties for wet and dry noise leads to significant adverse impact criteria of 49dB for wet noise and 52dB for dry noise.

As for residential properties and vulnerable subgroups, if the absolute noise level criteria are not met, it is necessary to understand how the predicted wet and dry noise levels compare to the existing background noise levels with and without noise from rainfall. Where the absolute noise criteria are exceeded, BS4142 can be used to predict how prevalent the noise from the OHL will be compared to existing background noise levels. Where background noise levels are high, the impact of noise from the OHL will be lower than the absolute predicted noise levels suggest.

PART 3 – PRACTICAL APPLICATION OF NOISE CRITERIA

12 OHL VOLTAGE

Noise criteria apply to 275 and 400kV OHL's. Historically 132kV OHL's have been described as practically quiet. Noise modelling in EFC400 using the smallest single conductor (Horse) that could theoretically be strung on L4 and L7 towers confirms this to be the case. In reality, the use of a such a small conductor would not be practical and hence this is a worst-case example assessment. The modelling demonstrates that the noise from this worse case 132kV OHL design would fall into the No Adverse Impact category and therefore noise from 132kV OHL's will always be deemed to be acceptable.

13 TIERED ASSESSMENT APPROACH

To enable an efficient assessment method, a tiered approach to the noise assessment has been developed. The three-tier approach comprises the following steps:

Tier 1: A primary screening step based on 'worst-case' wet noise effects and the pre-determined assessment criteria in Table 1.

Tier 2: A further screening step based on combined wet noise and dry noise effects and, if required, recalculated assessment criteria.

Tier 3: Full assessment following the principles of BS 4142:2014 for both wet and dry noise.

This approach screens out of further assessment, receptors where there would be no adverse impact, ensuring complex noise modelling and background noise measurements are only undertaken where necessary. This reduces the number of properties requiring detailed assessment.

Tier 1

The tiered assessment approach firstly considers wet noise only because this is a worst-case assessment. If the noise criteria are met, no further assessment is necessary, as noise in dry weather conditions will also meet the criteria.

Tier 2

Where the criteria are exceeded, further assessment is necessary because in reality, wet noise will not occur all the time. A more realistic assessment would account for the duration of wet and dry weather and hence account for wet and dry noise in combination. This forms the basis of the Tier 2 assessment, whereby the duration of wet and dry weather is determined to enable the combined wet and dry level noise level to be calculated. The combined wet and dry noise criteria may also need to be recalculated again because wet noise does not occur all the time.

Tier 3

Where the noise levels fail the absolute noise criteria laid down in the Tier 1 and Tier 2 criteria, it is important to consider the predicted noise level relative to the existing background noise. Simply because the absolute criteria are exceeded, does not mean the noise is causing an adverse or significant adverse impact, as the existing background noise level may already exceed the predicted level of noise from the OHL. Consequently, it's essential to understand how the predicted noise level from the OHL compares against the exiting noise climate. The context in which the noise occurs may affect the acceptability of the noise impact and also needs to be considered.

14 DEVELOPMENT CONSENT ORDER

Development Consent Order (DCO) applications require an Environmental Impact Assessment (EIA) to be carried out. The reporting of the noise impact for an EIA differs from the method of reporting for internal noise assessments and local authority planning applications.

DCO projects require the sensitivity of NSR's to be defined, along with the predicted magnitude of the noise impact at each NSR, to give an overall significance of effect. The significance of effect determines whether, in EIA terms, the predicted impact is significant.

Major adverse effects, which correspond to significant adverse impacts are deemed to be significant for the purposes of DCO/EIA noise assessments and should therefore be avoided.

15 EFC400 OUTPUTS

EFC400 is a software tool which can be used to predict noise from OHL's. EFC400 produces an annual average sound pressure level equivalent to an L_{Aeq} for both wet and dry noise and has 12 different noise calculation methods built in. The outputs of each of these 12 methods has been analysed and compared to the outputs of National Grid's DOS based OHL noise prediction tool.

One of the EFC400 inbuilt calculation tools (F9 EPRI in EFC400) is an EPRI method, the theory of which is documented in clear detail in the EPRI Red book. The method is combined in EFC400 with ISO 9613, which takes account of propagation of noise outdoors and also allows the rainfall rate to be adjusted manually. The method predicts the level of OHL noise with an accuracy of +/- 1dB and the predicted noise levels correlate very well (within ~1dB) with the current National Grid method.

The EFC400 software has capabilities beyond those we currently have for modelling noise from OHL's. All input and output parameters are clearly documented and there is less chance of errors being introduced as there is no requirement to transfer data between software packages. The use of this method (F9 EPRI Method in EFC400) is more transparent and defendable than the current National Grid method and is an improved approach to OHL noise assessment.

EFC400 can be used to produce generic data for noise levels at set distances from OHL's. Generic 'look up' data has been produced for each Type Registered OHL configuration. Generic data has been produced for a straight section of OHL, as well as a curved section of OHL. NSR's on the inside of a bend are closer to more than one conductor span and hence noise levels are higher on the inside of a bend and lower on the outside of a bend. The 'Look up' tables give a quick, high level overview of the noise level at set distances from the OHL and can therefore be used to inform noise assessments.

EFC400 can also be used for detailed noise modelling. The specific OHL design can be loaded into the model, along with OS map and terrain data to give detailed, design specific outputs for individual NSR's. Detailed modelling may be used where a NSR is on the edge of a Noise Impact Category or where the nature of the assessment requires detailed analysis of individual NSR, for example, DCO applications.

PART 4 – COMPARISON WITH PREVIOUS APPROACH TO OHL NOISE ASSESSMENT

16 OVERVIEW

Previously, noise criteria only existed for DCO applications and each of these were developed on a project specific basis, taking account of the UK policy context in place at the time when the DCO application was made. Previous DCO criteria, compared to the new criteria are shown in Table 2. In-house noise assessments were undertaken based on operational experience, rather than strictly applied criteria, leading to a lack of clarity and consistency. The new approach to OHL noise assessment will apply to all projects, whether DCO or in-house, leading to a clear and consistent approach.

17 DCO APPLICATIONS

In the context of DCO applications, previously there was no absolute maximum cut off noise level above which the noise was unacceptable. Major adverse effects, which were deemed to occur where the rating noise level exceeded the existing background noise level with or without noise from rain by +5dB or more, were deemed significant. Whilst we would attempt to mitigate the effect of such an impact, there was no policy stance to say this should be avoided. The new policy stance states that significant adverse impacts should be avoided and therefore effectivity sets a maximum limit, which essentially equates to a rating level ≥+10dB. This is a key difference between the previous and new approach.

At the lower ends of the noise criteria, we have previously applied a backstop, whereby background noise levels were set as a minimum of 30dB. The resulting effect of this being that the method potentially underestimated the impact of noise in areas with background noise levels lower than 30dB. In other cases, we assessed against a measured background

level, which could have been considerably lower than 30dB and may have overestimated the impact of noise from the OHL. We also set criteria whereby a Major adverse effect was deemed to occur where the rating level was greater than or equal to 35dB and the difference between the background noise level and the rating level was greater than or equal to +5dB. This therefore took account of the absolute level of noise being important, as well as the difference between the rating level and background noise level. The new approach does not apply those backstops.

The previous assessment method looked at wet noise and dry noise separately. Where wet noise dictated the outcome of the assessment, the duration of wet noise was referenced. As wet noise occurs for a small proportion of time, the impact of wet noise was considered of short duration and therefore of a lesser impact than the assessment outcome suggested. When measured background noise levels were used in the assessment and those background levels were particularly low, dry noise often dictated the outcome of the assessment. Whilst the dry noise absolute levels could have been relatively low, the outcome of the assessment may have suggested a significant adverse effect due to a large difference between the measured background noise level and predicted level of noise from the OHL, which has to assume a level of contamination on the conductors. This may have resulted in an over estimation of the impact. The new approach will more accurately reflect noise levels due to both dry and wet noise combined and is therefore a better reflection of the predicted scenario. In addition, the assessment criteria are directly linked to the current UK policy position. It is therefore considered to be more robust that the previous method.

Table 2: Comparison between previous assessment methods and the newly developed approach[15]

Effect	Previous Criteria (Richborough & Hinkley)[16]	Previous Criteria (North Wales)	New Criteria
Major Adverse	≥+5dB Assessment level	≥35dB Rating level and ≥+5dB Assessment level	≥44dB SPL and ≥+10dB Assessment Level
Moderate Adverse	0 to +5dB Assessment level	<35dB Rating level and ≥+5dB Assessment level	34 to 44dB SPL and +5 to +9dB Assessment Level
Minor Adverse	0 to -5dB Assessment level	0 to -5dB Assessment level	<34dB SPL and 0 to +4dB Assessment Level
Negligible	-5 to -10dB Assessment level	-5 to -10dB Assessment level	<34dB SPL and <0dB Assessment Level
No Effect	<-10dB Assessment Level	<-10dB Assessment Level	<34dB SPL and <0dB Assessment Level

[15] The new Tier 2 criteria are not included in Table 2 as they have to be calculated on an individual basis, however they will not be more than 3dB higher than the Tier 1 sound pressure level (SPL)
[16] Assessed against a 30dB minimum background noise level.

PART 5 - DEFINITIONS AND DOCUMENT HISTORY

18 FORMS AND RECORDS

Not applicable.

19 DEFINITIONS

Not applicable.

20 AMENDMENTS RECORD

Issue	Date	Summary of Changes / Reasons	Author(s)	Approved By (Inc. Job Title)
1	February 2021	New report	Janine Dickinson Senior Environmental Engineer	Jemma Spencer Environmental Engineering Manager

21 IMPLEMENTATION

Audience Awareness

Audience	Purpose Compliance (C) / Awareness (A)	Notification Method Memo / letter / fax / email / team brief / other (specify)
Environmental Engineering	A	Email

PART 6 - GUIDANCE NOTES AND APPENDICES

APPENDIX A – SUMMARY OF EVIDENCE FOR EFFECTS DUE TO NOISE

Noise level (dB)	Indicator	Time period	Night/ day	Health Effect	Source	Where	NOEL/ LOAEL/ SOAEL	Notes*^
30	$L_{Aeq, indoor}$	8 hr	Night	Sleep disturbance	WHO Guidelines	Residential	LOAEL	Values for onset of health effects. Tonal noise requires a lower value. Covers vulnerable people. Sleep disturbance.
30	$L_{Aeq, indoor}$	8 hr & 16 hr	Day & Night	Sleep	WHO Guidelines	Hospitals	LOAEL	Values for onset of health effects. Sleep disturbance day and night.
30	$L_{Aeq, indoor}$	Sleeping time	Day	Sleep	WHO Guidelines	Pre-school bedrooms	LOAEL	Values for onset of health effects.
30	$L_{Aeq, indoor}$	8 hr	Night	Sleep	BS8233	Bedroom	LOAEL	May be relaxed by 5dB and reasonable internal conditions still achieved. Design target for new build.
30	$L_{Aeq, indoor}$	8 hr	Night	Sleep	ProPG: Planning and Noise	Bedroom	LOAEL	Based on BS8233
35	$L_{Aeq, indoor}$	16 hr	Day	Resting	WHO Guidelines	Bedroom/ Living room	LOAEL	Values for onset of health effects. Speech intelligibility & moderate annoyance
35	$L_{Aeq, indoor}$	16 hr	Day	Resting	BS8233	Bedroom/ Living room	LOAEL	May be relaxed by 5dB and reasonable internal conditions still achieved. Design target for new build.
35	$L_{Aeq, indoor}$	16 hr	Day	Resting	ProPG: Planning and Noise	Bedroom/ Living room	LOAEL	Based on BS8233
35	$L_{Aeq, indoor}$	School hours	Day	Speech Intelligibility	WHO Guidelines	Schools	LOAEL	Speech Intelligibility

70	$L_{Aeq,\ indoor\ \&\ outdoor}$	24 hr	Day & Night	Hearing impairment	WHO Guidelines	Anywhere e.g. industrial, commercial, shopping area	SOAEL	Sufficient Evidence. This will protect the public, including most vulnerable subgroups e.g. children, chronically ill and elderly from adverse health effects.
<40	$L_{Aeq,\ outdoor}$	8 hr	Night	Sleep disturbance	ProPG: Planning and Noise	Residential	NOEL	No adverse effect
40	$L_{Aeq,\ outdoors}$	8 hr	Night	Sleep disturbance	Night Noise Guidelines for Europe	Residential	LOAEL	Effects on sleep observed. Vulnerable subgroups more susceptible. However even in worst cases the effects seem modest.
45	$L_{Aeq,\ outdoors}$	8 hr	Night	Sleep disturbance	WHO Guidelines	Residential	LOAEL	Values for onset of health effects. Tonal noise requires a lower value. Covers vulnerable people. Sleep disturbance.
50	$L_{night,\ outside}$	8 hr	Night	Hypertension (high blood pressure)	Night Noise Guidelines for Europe	Residential	SOAEL	Limited Evidence
50	$L_{night,\ outside}$	8 hr	Night	Heart attack	Night Noise Guidelines for Europe	Residential	SOAEL	Limited Evidence
50	$L_{Aeq,\ outdoors}$	16 hr	Day	Moderate annoyance	WHO Guidelines	Outdoor Living area	LOAEL	Values for onset of health effects.
55	$L_{Aeq,\ outdoors}$	16 hr	Day	Serious annoyance	WHO Guidelines	Outdoor Living area	SOAEL	Values for onset of health effects.
55	$L_{Aeq,\ outdoors}$	Playtime	Day	Annoyance	WHO Guidelines	School or playground	LOAEL	Values for onset of health effects.
60	$L_{night,\ outside}$	8 hr	Night	Psychiatric disorders	Night Noise Guidelines for Europe	Residential	SOAEL	Limited Evidence
40-55	$L_{night,\ outside}$	8 hr	Night	Adverse health effects	Night Noise Guidelines for Europe	Residential	LOAEL-SOAEL	Adverse health effects observed. People have to adapt lives to cope.

>55	$L_{night, outside}$	8 hr	Night	Frequent adverse health effects	Night Noise Guidelines for Europe	Residential	SOAEL	Adverse health effects occur frequently. Large proportion of population annoyed or sleep disturbed. Evidence that risk of cardiovascular disease increases.
0	Rating Level		Day/ Night	Low impact	BS4142**	Residential	NOEL-LOAEL	Low impact
+5	Rating Level		Day/ Night	Adverse	BS4142**	Residential	LOAEL-SOAEL	Adverse
+10	Rating Level		Day/ Night	Significant adverse	BS4142**	Residential	SOAEL	Significant adverse

* In all cases the guidance recommends even lower levels for tonal noise

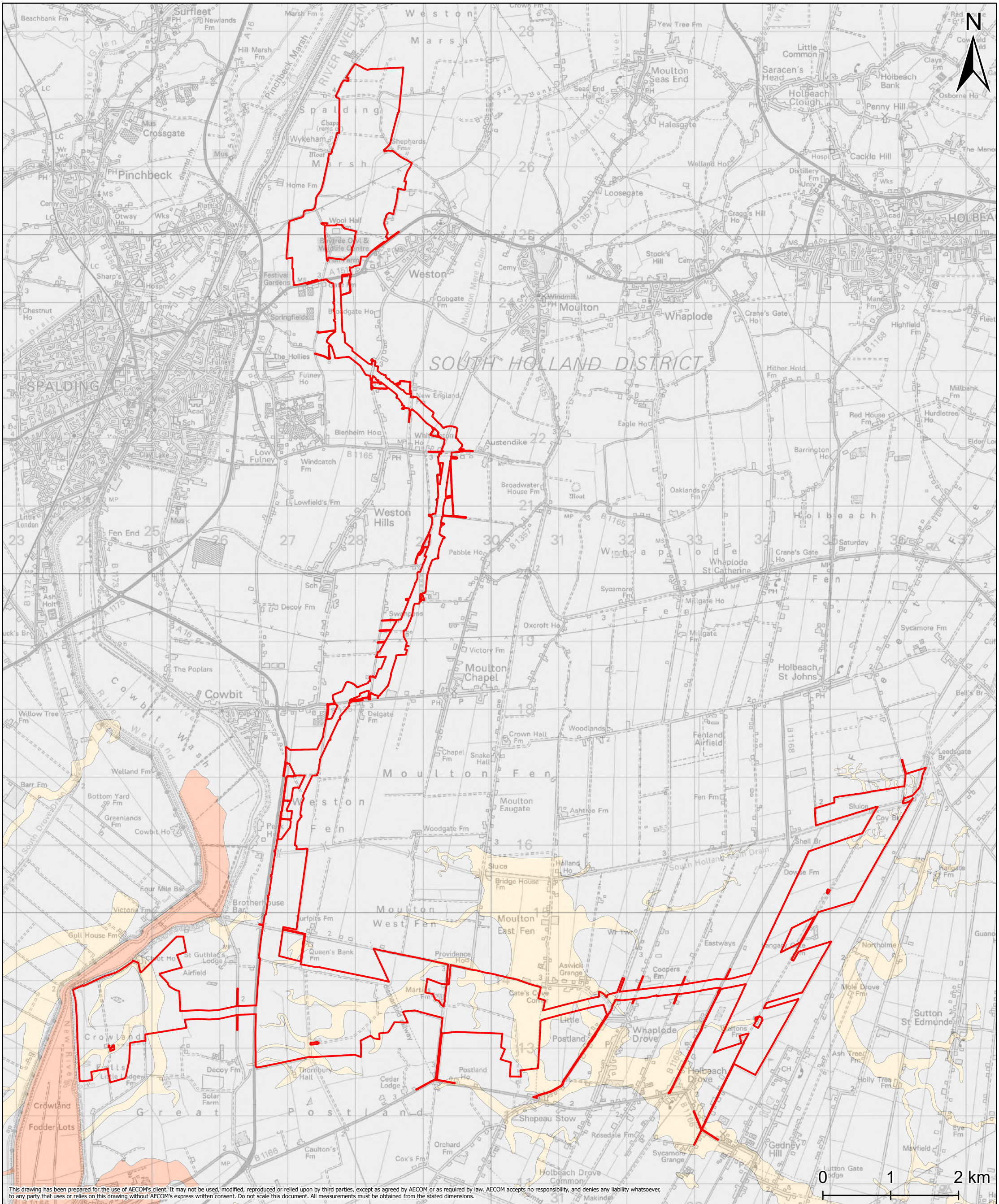
^ Most guidance documents recommend 10 to 15dB attenuation for an open window

** +2dB penalty for tonal noise that's just perceptible, +4dB clearly perceptible and +6dB highly perceptible. +3dB penalty for distinctive noise (not tonal).

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152

Appendix G: Q19.0.3 Secondary Aquifers



This drawing has been prepared for the use of AECOM's client. It may not be used, modified, reproduced or relied upon by third parties, except as agreed by AECOM or as required by law. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that uses or relies on this drawing without AECOM's express written consent. Do not scale this document. All measurements must be obtained from the stated dimensions.

Project Title

Meridian Solar Farm

Map Title

Figure Q19.0.3: Examining Authority's Written Questions 1

Scale	Version	Drawn	Reviewed
1:50,000	0	CT	AD

Legend

- Order Limits

Aquifer Designation - Superficial

- Secondary A
- Secondary (undifferentiated)
- Unproductive

Date: 19/10/2026

Copyright

Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack. Reproduced from Ordnance Survey digital map data © Crown copyright 2025. All rights reserved. Licence number AC0000808122.
Derived from 1:50,000 scale BGS Digital Data under Licence No. 1135349 British Geological Survey © and Database Right UKRI. All rights reserved.

Meridian Solar

Appendix H: Q20.0.10 Alignment of the InterGen NTS to Spalding PS Pipeline

N

G1

4SV44

4SV43

4SV42

4SV41

4SV40

0 100 200 m

This drawing has been prepared for the use of AECOM's client. It may not be used, modified, reproduced or relied upon by third parties, except as agreed by AECOM or as required by law. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that uses or relies on this drawing without AECOM's express written consent. Do not scale this document. All measurements must be obtained from the stated dimensions.

Project Title

Meridian Solar Farm

Map Title

Figure Q20.0.10: Examining Authority's Written Questions 1

Scale	Version	Drawn	Reviewed
1:5,000	0	CT	AD

Legend

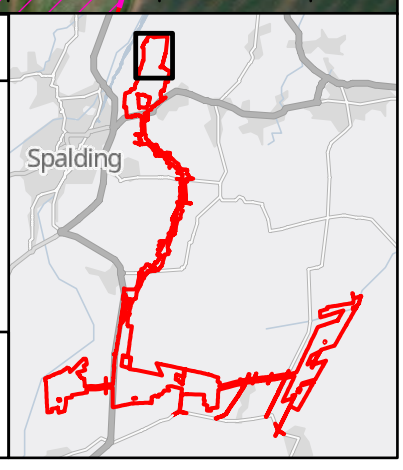
- Order Limits
- Pylons
- Gantry
- Indicative OHL
- InterGen NTS to Spalding PS Pipeline
- OHL Limit of Deviation
- Stringing Positions
- Construction Access
- Third Party Centreline
- Third Party Access
- Crossing Protection
- LOD for Routeing into Substation
- Working Area
- Bellmouths

Date: 19/10/2026

Copyright

Microsoft, Vantor, Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack. Reproduced from Ordnance Survey digital map data © Crown copyright 2025. All rights reserved. Licence number AC0000808122.

Meridian Solar



Appendix I: ExQ1 Annex A Review

ExQ1 Annex A: Habitats Regulations Assessment – Applicant and Statutory Nature Conservation Body (SNCB) position summary table

Responses are due by deadline 3: 27 October 2026

The following table sets out a summary of the ExA's understanding of the applicant's screening exercise and assessment of effects on integrity, and agreement with Natural England (NE) at the time of publication of ExQ1.

Abbreviations used:

AEoI	Adverse Effect on Integrity
LSE	Likely Significant Effect

Key to table:

C	Construction
DO	Decommissioning
O	Operation and Maintenance
LSE / AEoI	LSE or AEoI cannot be excluded
No LSE / No AEoI	LSE or AEoI can be excluded
?	Unclear
n/a	Not applicable

Note that the conclusions recorded in the table below apply to impacts from the proposed development alone and in-combination, unless otherwise stated.

European site and qualifying feature(s)	Impact pathway	Applicant's conclusions on LSE [REP1-042]			Natural England's conclusion on LSE [REP2-026]			Applicant's conclusion on AEoI [REP1-042]			Natural England's conclusion on AEoI [REP2-026]		
		C	O	D	C	O	D	C	O	D	C	O	D
The Wash and North Norfolk Coast SAC													
Annex 1 habitats: • 1110 Sandbanks which are slightly covered by sea water all the time • 1140 Mudflats and sandflats not covered by seawater at low tide • 1160 Large shallow inlets and bays • 1170 Reefs • 1310 Salicornia and other annuals colonizing mud and sand • 1330 Atlantic salt meadows • 1420 Mediterranean and thermos-Atlantic halophilous scrubs • Coastal lagoons Annex II species: 1365 Harbour Seal	Air quality	No LSE	-	No LSE	n/a (NE12)	-	n/a (NE12)	-	-	-	-	-	-
	Water pollution	No LSE	-	No LSE	No LSE (NE13)	-	No LSE (NE13)	-	-	-	-	-	-
Annex II species: 1355 Otter	Loss (C, D) or disturbance (O) to functionally linked land	No LSE	No LSE	No LSE	No LSE (NE9)	No LSE (NE9)	No LSE (NE9)	-	-	-	-	-	-
	Direct impacts on individuals of qualifying species	No LSE	No LSE	No LSE	No LSE (NE11)	No LSE (NE11)	No LSE (NE11)	-	-	-	-	-	-
The Wash SPA													
Article 4.1 Qualification: Breeding common tern, little tern Article 4.2 Qualification: Non-breeding birds: Bar-tailed godwit, Bewick's swan, black-tailed godwit, common scoter, curlew, dark-bellied Brent goose, dunlin, gadwall, goldeneye, grey plover, knot, oystercatcher, pink-footed goose, pintail, redshank, sanderling, shelduck, turnstone, wigeon Article 4.2 qualification: An internationally important assemblage of birds (comprising all species above) (See Q11.0.2, Q11.0.3)	Air quality	No LSE	-	No LSE	n/a (NE12)	-	n/a (NE12)	-	-	-	-	-	-
	Direct impacts on individuals of qualifying species	No LSE	-	No LSE	No LSE (NE14)	-	No LSE (NE14)	-	-	-	-	-	-
	Water pollution	No LSE	-	No LSE	No LSE (NE13)	-	No LSE (NE13)	-	-	-	-	-	-
	Disturbance from noise and vibration impacts to functionally linked land (See Q11.0.15)	LSE	No LSE	LSE	LSE (NE7)	??	LSE (NE7)	No AEoI	-	No AEoI	**AEoI (NE18)**	??	**AEoI (NE18)**
	Direct loss of functionally linked land (See Q11.0.15)	No LSE	~~??~~ -	No LSE	**LSE (NE6)**	??	**LSE (NE6)**	-	-	-	**AEoI (NE18)**	??	**AEoI (NE18)**
	Predator Shadow (See Q11.0.15)	-	~~-~~No LSE	-	??	**LSE (NE8)**	??	-	-	-	??	**AEoI (NE18)**	??

European site and qualifying feature(s)	Impact pathway	Applicant's conclusions on LSE [REP1-042]			Natural England's conclusion on LSE [REP2-026]			Applicant's conclusion on AEoI [REP1-042]			Natural England's conclusion on AEoI [REP2-026]		
		C	O	D	C	O	D	C	O	D	C	O	D
	Collision risk	-	LSE	-	-	LSE (NE10)	-	-	No AEoI	-		No AEoI (NE15)	
The Wash Ramsar site													
Ramsar Criterion 1: Estuary Ramsar Criterion 3: Inter-relationship between its various components including saltmarshes, intertidal sand and mud flats and the estuarine waters Ramsar Criterion 5: Waterfowl assemblages of international importance (See Q11.0.2, Q11.0.3) Ramsar Criterion 6: Species/populations occurring at levels of international importance (Species with peak counts in spring/autumn) – oystercatcher, grey plover, knot, sanderling, curlew (breeding), redshank, turnstone	Air quality	No LSE	-	No LSE	n/a (NE12)	-	n/a (NE12)	-	-	-	-	-	-
	Direct impacts on individuals of qualifying species	No LSE	-	No LSE	No LSE (NE14)	-	No LSE (NE14)	-	-	-	-	-	-
	Water pollution	No LSE	-	No LSE	No LSE (NE13)	-	No LSE (NE13)	-	-	-	-	-	-
	Disturbance from noise and vibration impacts to functionally linked land (See Q11.0.15)	LSE	No LSE	LSE	LSE (NE7)	??	LSE (NE7)	No AEoI	-	No AEoI	**AEoI (NE18)**	??	**AEoI (NE18)**
	Direct loss of functionally linked land (See Q11.0.15)	No LSE	-	No LSE	**LSE (NE6)**	??	**LSE (NE6)**	-	-	-	**AEoI (NE18)**	??	**AEoI (NE18)**
Ramsar Criterion 6: Species/populations occurring at levels of international importance (Species with peak counts in winter) – pink footed goose, dark bellied brent goose, shelduck, pintail, dunlin, bar tailed godwit	Predator Shadow (See Q11.0.15)	-	-No LSE	-	??	**LSE (NE8)**	??	-	-	-	??	**AEoI (NE18)**	??
	Collision risk	-	LSE (NE10)	-		LSE		-	No AEoI	-		No AEoI (NE15)	
Potential Ramsar criterion 6: Spring / Autumn - Ringed Plover, black tailed godwit Potential Ramsar criterion 6: winter - golden plover, lapwing (See Q11.0.4)	~~??~~Air quality Direct impacts on individuals of qualifying species Water pollution Direct loss of functionally linked land (See Q11.0.15) Predator Shadow (See Q11.0.15)	LSE~~??~~	No LSE~~??~~	LSE~~??~~	??	??	??	No AEoI~~??~~	-~~??~~	No AEoI~~??~~	??	??	??
	Collision risk	-	LSE	-				-	No AEoI	-			
Baston Fen SAC													
Annex II species: 1149 Spined loach	Air Quality	No LSE	-	No LSE	n/a (NE12)	-	n/a (NE12)	-	-	-	-	-	-
	Water pollution	No LSE	-	No LSE	No LSE (NE13)	-	No LSE (NE13)	-	-	-	-	-	-
Nene Washes SAC													
Annex II species: 1149 Spined loach	Air Quality	No LSE	-	No LSE	n/a (NE12)	-	n/a (NE12)	-	-	-	-	-	-

European site and qualifying feature(s)	Impact pathway	Applicant's conclusions on LSE [REP1-042]			Natural England's conclusion on LSE [REP2-026]			Applicant's conclusion on AEoI [REP1-042]			Natural England's conclusion on AEoI [REP2-026]		
		C	O	D	C	O	D	C	O	D	C	O	D
	Water pollution (See Q11.0.7)	~~??~~No LSE	~~??~~-	~~??~~No LSE	??	??	??	~~??~~-	~~??~~-	~~??~~-	??	??	??
Nene Washes SPA													
Article 4.1 Qualification: Non breeding Bewick's swan Article 4.2 Qualification: Breeding shoveler, garganey, gadwall, black tailed godwit, pintail, teal and wigeon (See Q11.0.1)	Air Quality	No LSE	-	No LSE	n/a (NE12)	-	n/a (NE12)	-	-	-	-	-	-
	Direct impacts on individuals of qualifying species	No LSE	-	No LSE	No LSE (NE14)	-	No LSE (NE14)	-	-	-	-	-	-
	Water pollution	No LSE	-	No LSE	No LSE (NE13)	-	No LSE (NE13)	-	-	-	-	-	-
	Disturbance from noise and vibration impacts to functionally linked land (See Q11.0.15)	~~No~~ LSE	No LSE	~~No~~ LSE	??	??	??	No AEoI-	-~~-~~	No AEoI-	??	??	??
	Direct loss of functionally linked land (See Q11.0.15)	No LSE	-	No LSE	??	??	??	-	-	-	??	??	??
	Predator Shadow (See Q11.0.15)	-	-No LSE	-	??	??	??	-	-	-	??	??	??
	Collision risk	-	No LSE	-	??	??	??	-	-	-	??	??	??
Nene Washes Ramsar site													
Ramsar Criterion 6: Species/populations occurring at levels of international importance with peak counts in winter - Bewick's swan	Air Quality (traffic)	No LSE	-	No LSE	n/a (NE12)	-	n/a (NE12)	-	-	-	-	-	-
	Direct impacts on individuals of qualifying species	No LSE	-	No LSE	No LSE (NE14)	-	No LSE (NE14)	-	-	-	-	-	-
	Water pollution	No LSE	-	No LSE	No LSE (NE13)	-	No LSE (NE13)	-	-	-	-	-	-
	Disturbance from noise and vibration impacts to functionally linked land (See Q11.0.15)	No LSE	No LSE	No LSE	LSE (NE7)	??	LSE (NE7)	~~No AEOI~~-	-	~~No AEoI~~-	**AEoI (NE18)**	??	**AEoI (NE18)**
	Direct loss of functionally linked land (See Q11.0.15)	No LSE	-	No LSE	**LSE (NE6)**	??	**LSE (NE6)**	-	-	-	**AEoI (NE18)**	??	**AEoI (NE18)**
	Predator Shadow (See Q11.0.15)	-	-	-	??	**LSE (NE8)**	??	-	-	-	??	**AEoI (NE18)**	??
	Collision risk	-	LSE	-	-	LSE (NE10)	-	-	No AEoI	-	-	No AEoI (NE15)	
Potential Ramsar criterion 6: wintering pintail	Air Quality (traffic)				??	??	??	~~??~~-	~~??~~-	~~??~~-	??	??	??

European site and qualifying feature(s)	Impact pathway	Applicant's conclusions on LSE [REP1-042]			Natural England's conclusion on LSE [REP2-026]			Applicant's conclusion on AEoI [REP1-042]			Natural England's conclusion on AEoI [REP2-026]		
		C	O	D	C	O	D	C	O	D	C	O	D
Potential Ramsar criterion 6: spring / autumn black tailed godwit (See Q11.0.4) Ramsar criterion 2 (See Q11.0.3)	Direct impacts on individuals of qualifying species Water pollution Disturbance from noise and vibration impacts to functionally linked land (See Q11.0.15) Direct loss of functionally linked land (See Q11.0.15) Predator Shadow (See Q11.0.15) Collision risk~~??~~ ~~??~~	~~??~~No LSE ~~??~~	~~??~~No LSE ~~??~~	~~??~~No LSE ~~??~~	~~??~~	~~??~~	~~??~~	-~~??~~	-~~??~~	-~~??~~	~~??~~	~~??~~	~~??~~