Planning Inspectorate
Arolygiaeth Gynllunio

Planning Inspectorate

**Application by Meridian Solar Farm Limited for the Meridian Solar Farm project**

**The Examining Authority's written questions and requests for information (ExQ1): Issued on 13 October 2026**

**Responses are due by deadline 3: 27 October 2026**

The following table sets out the Examining Authority's (ExA's) written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further two rounds of written questions in due course. If this is done, the further rounds of questions will be referred to as ExQ2 and ExQ3.

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided as **annex C** to the Rule 6 Letter dated 23 July 2026 [PD-006]. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

**Note about Q9.0.1**: This question is for the applicant and the relevant Statutory Nature Conservation Bodies (SNCB). They are asked to review the ExA's position summary table at annex A and make any amendment through tracked changes to the Microsoft Word version.

Column 2 of the table indicates which interested parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue number and a question number. For example, the first question on air quality and emissions issues is identified as Q8.0.1. When you are answering a question, please start your answer by quoting the unique reference number.

**Use of artificial intelligence (AI) in casework evidence**

If you use AI to create your submission, you should tell us that you have done this. You should specify which systems or tools you have used, the source of the information that the AI system has based its content on, and what information the AI has been used to create or alter. Further information can be found in the Planning Inspectorate's guidance. By following this guidance, you will help the ExA to understand the origin

and accuracy of the information submitted, thereby supporting fair and impartial decision-making. **If you do not declare the use of AI in any evidence submission where it has been used or remove evidence such as watermarks, we reserve the right to reject the submission.**

You should respond to the questions by using the **Have your say** function on the project page of the National Infrastructure website and selecting ‘Responses to Examining Authority’s First Written Questions (ExQ1)’ when asked.

Download a copy of this Microsoft Word version of the ExA’s written questions, enter your answers and save the document using an appropriate file name. You can then submit the completed document by choosing ‘Make a comment’ and selecting ‘Upload files’.

**Abbreviations used:**

| | | | |
|---|---|---|---|
| **AEoI** | Adverse Effects on Integrity | **CRTN** | Calculation of Road Traffic Noise |
| **AEP** | Annual Exceedance Probability | **CSEC** | Cable Sealing End Compounds |
| **AI** | Artificial Intelligence | **dB** | Decibel |
| **AIL** | Abnormal Indivisible Load | **dDCO** | the draft Development Consent Order |
| **ALA1981** | Acquisition of Land Act 1981 | **DL** | Deadline |
| **AOD** | Above Ordnance Datum | **EA** | Environment Agency |
| **AP** | Affected Persons | **EIA** | Environmental Impact Assessment |
| **Art** | Article | **EL** | Examination Library |
| **BAT** | Best Available Technique | **EM** | Explanatory Memorandum |
| **BESS** | Battery Energy Storage System | **EMF** | Electric and Magnetic Fields |
| **BMV** | Best and Most Versatile | **ES** | Environmental Statement |
| **BNG** | Biodiversity Net Gain | **ExA** | Examining Authority |
| **BoR** | Book of Reference | **ExQ1** | Examining Authority's first written questions |
| **CA** | Compulsory Acquisition | **FID** | Final Investment Decision |
| **CA Guidance** | Planning Act 2008: guidance related to procedures for the compulsory acquisition of land | **FLL** | Functionally Linked Land |
| **CA Regulations** | The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 | **FRA** | Flood Risk Assessment |
| **CNGWMS** | Connection to the National Grid Weston Marsh Substation Note | **FS** | Funding Statement |

| | | | |
|---|---|---|---|
| **FTE** | Full Time Equivalent | **kHz** | Kilohertz |
| **GCR** | Grid Connection Route | **Km** | Kilometre |
| **GHG** | Greenhouse Gas | **LA** | Local Authority |
| **GVA** | Gross Value Added | **LCC** | Lincolnshire County Council |
| **GVLA3** | Guidelines for Landscape and Visual Impact Assessment third edition | **LFRS** | Lincolnshire Fire and Rescue Service |
| **ha** | Hectares | **LGV** | Large Goods Vehicle |
| **HDD** | Horizontal Directional Drilling | **LIR** | Local Impact Report |
| **HE** | Historic England | **LLFA** | Lead Local Flood Authority |
| **HEDBA** | Historic Environmental Desk Based Assessment | **LOAEL** | Lowest Observe Adverse Effect Level |
| **HGV** | Heavy Goods Vehicle | **LoD** | Limits of Deviation |
| **HHS** | Heritage Harm Statement | **LRT** | Land Rights Tracker |
| **HIA** | Health Impact Assessment | **LSE** | Likely Significant Effects |
| **HRA** | Habitats Regulations Assessment | **LVIA** | Landscape and Visual Impact Assessment |
| **IAC** | Inter Array Connection | **LWT** | Lincolnshire Wildlife Trust |
| **ICNIRP** | International Commission on Non-Ionizing Radiation Protection | **m** | Metre |
| **IEMA** | Institute of Environmental Management and Assessments | **MHCLG** | Ministry of Housing, Communities and Local Government |
| **ISEP** | Institute of Sustainable environment Professionals | **MW** | Megawatt |
| **ISH1** | Issue Specific Hearing 1 | **MWh** | Megawatt Hour |

| | |
|---|---|
| **NE** | Natural England |
| **NESO** | National Energy System Operator |
| **NGET** | National Grid Electricity Transmission |
| **NPA 2017** | Neighbourhood Planning Act 2017 |
| **NPPF** | National Planning Policy Framework |
| **NPS** | National Policy Statement |
| **NPS EN-1** | Overarching National Policy Statement for Energy |
| **NPS EN-3** | National Policy Statement for Renewable Energy Infrastructure |
| **NPS EN-5** | National Policy Statement for Electricity Networks Infrastructure |
| **NSIP** | Nationally Significant Infrastructure Project |
| **OAMMS** | Outline Archaeological Mitigation Management Strategy |
| **OBSMP** | Outline Battery Safety Management Plan |
| **OCEMP** | Outline Construction Environmental Management Plan |
| **OCTMP** | Outline Construction Traffic Management Plan |
| **ODEMP** | Outline Decommissioning Management Plan |
| **OFERP** | Outline Flood Emergency Response Plan |
| **OL** | Order Limits |
| **OLEMP** | Outline Landscape and Ecology Management Plan |
| **OOEMP** | Outline Operational Environmental Management Plan |
| **OPRoWMP** | Outline Public Rights of Way Management Plan |
| **OSMP** | Outline Soil management Plan |
| **OSSCEP** | Outline Skills, Supply Chain and Employment Plan |
| **OSWMP** | Outline Site Waste Management Plan |
| **PA2008** | The Planning Act 2008 |
| **PCC** | Peterborough City Council |
| **PoC** | Point of Connection |
| **PPA** | Planning Performance Agreement |
| **PRoW** | Public Right of Way |
| **PS** | Planning Statement |
| **PSGC** | Peterborough and Spalding Gliding Club |
| **PV** | photovoltaic |
| **R** | Requirement |

| | |
|---|---|
| **RAC** | Reading Agricultural Consultants |
| **RR** | Relevant Representations |
| **RVAA** | Residential Visual Amenity Assessment |
| **s** | Section of Parliamentary Legislation |
| **SAC** | Special Area of Conservation |
| **SDA** | Solar Development Area |
| **SHDC** | South Holland District Council |
| **SI** | Statutory Instrument |
| **SM** | Scheduled Monument |
| **SNCB** | Statutory Nature Conservation Body |
| **SOAEL** | Significant Observed Adverse Effect Level |
| **SoCG** | Statement of Common Ground |
| **SoR** | Statement of Reasons |
| **SoS** | Secretary of State |
| **SPA** | Special Protection Area |
| **SRN** | Strategic Road Network |
| **SSSI** | Site of Special Scientific Interest |
| **SU** | Statutory Undertaker |
| **SuDS** | Sustainable Urban Drainage Systems |
| **TP** | Temporary Possession |
| **TPO** | Tree Preservation Order |
| **UTC** | Coordinated Universal Time |
| **UXO** | Unexploded Ordnance |
| **WFD** | Water Framework Directive |
| **WR** | Written Representation |

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**The Examination Library**

References in these questions set out in square brackets (for example [APP-001]) are to documents catalogued in the Examination Library (EL). The EL can be obtained from the following link: Examination Library

It will be updated as the examination progresses.

**Citation of questions**

Questions in this table should be cited as follows:

Question reference: issue reference: question number, for example ExQ1 1.0.1 – refers to question 1 in this table.

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| ExQ1 | Question to: | Question: |
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| **1. General and cross-topic questions** | | |
| Q1.0.1 | The applicant<br>North Level District Internal Drainage Board | **Statement of Common Ground**<br>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. |
| Q1.0.2 | The applicant | **Common land**<br>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. |
| Q1.0.3 | The applicant | **ES Figure 2-6: Solar Development Area and Inter-Array Connections Illustrative Construction Layout Plan (sheet 3 of 8)**<br>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]. |
| Q1.0.4 | The applicant<br>All interested parties | **National Planning Policy Framework**<br>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.<br><br>**Environment Agency position:** We do not consider that the updated NPPF changes our position. |
| Q1.0.5 | The applicant | **List of cumulative projects**<br>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? |
| Q1.0.6 | The applicant | **Decommissioning – general**<br>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].<br>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?<br>Please also confirm:<br>• The anticipated period of time between the first and final commissioning phases and the maximum period over which commissioning could take place.<br>• 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?<br>• 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. |
| Q1.0.7 | The applicant | **Seasonal output variations**<br>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. |
| Q1.0.8 | The applicant | **Planning performance agreement**<br>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.<br>If not, please explain why PPAs are not considered necessary. |

| ExQ1 | Question to: | Question: |
|---|---|---|
| Q1.0.9 | The applicant | **Battery energy storage system (BESS)**<br>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."<br>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)? |
| Q1.0.10 | The applicant | **Overplanting and justification for land take**<br>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.<br>Also provide a justification for the proposed ratio, to include:<br>• The extent to which overplanting is necessary to consider panel degradation, maximise energy generation and optimise any future grid connection.<br>• 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.<br>• 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). |
| **2** | **Design, parameters and other details of the proposed development** | |
| Q2.0.1 | The applicant | **Pylons**<br>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. |
| Q2.0.2 | The applicant | **Construction compounds**<br>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:<br>• An illustrative figure of construction compound layout for the variety of construction compounds across the solar development area<br>• An illustrative figure for the compound layout for Work Nos. 3A and 3B<br>• 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<br>• 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)<br>• 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?<br>• 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<br>• Confirm where items listed within Work No.5(k) would be sited within the Order limits (OL) and how this would be controlled. |
| Q2.0.3 | The applicant | **Pylons**<br>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.<br>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?<br>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: |
|---|---|---|
| Q2.0.4 | South Holland Internal Drainage Board | **Pylons and clearance height**<br>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 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**<br>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.<br>Please include a maximum CSEC height within the Design Parameters document [REP1-055]**.** |
| Q2.0.6 | The applicant | **Cable sealing end compounds**<br>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]. |
| Q2.0.7 | The applicant | **Cable sealing end compounds**<br>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.<br>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. |
| Q2.0.8 | The applicant<br>National Grid Electricity Transmission | **Pylons**<br>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].<br>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.<br>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. |
| Q2.0.9 | The applicant | **Design principles**<br>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.<br>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:<br>• solar panels and associated equipment<br>• on-site substations and associated equipment and structures<br>• BESS<br>• boundary treatments<br>• hard and soft landscaping |

| ExQ1 | Question to: | Question: |
|---|---|---|
| Q2.0.10 | The applicant | **Independent design review**<br>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? |
| Q2.0.11 | The applicant | **Design guides**<br>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. |
| Q2.0.12 | The applicant | **Replacement of panels**<br>Table 2.5 of ES Chapter 2 [AS-017] details scheme component replacement assumptions. Please confirm:<br>• What guarantees are there that the panels will be the same size as those being replaced?<br>• If there are no guarantees, would this mean that there may be a need for additional piling to be carried out at this time?<br>• 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?<br>• Alternatively, would there be a reduction in number of panels in order to limit the output? |
| Q2.0.13 | The applicant | **Planning Statement**<br>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? |
| **3. Grid connection** | | |
| Q.3.0.1 | The applicant | **Gate 1 offer**<br>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. |
| Q.3.0.2 | The applicant | **Gate 2 readiness**<br>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. |
| Q.3.0.3 | National Energy System Operator | **Gate result and strategic alignment**<br>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**<br>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**<br>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**<br>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. |

| ExQ1 | Question to: | Question: |
|---|---|---|
| | | 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.<br>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. |
| Q.3.0.7 | The applicant | **Overarching National Policy Statement for Energy EN-1**<br>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. |
| Q.3.0.8 | The applicant<br>National Grid Electricity Transmission | **Grimsby to Walpole proposed development**<br>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.<br>The applicant: What weight should the ExA give the proposed Grimsby to Walpole development when undertaking the planning balance exercise? |
| Q.3.0.9 | The applicant | **Final investment decision**<br>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:<br>• What specific matters need to be resolved before the applicant considers sufficient certainty regarding the feasibility of the connection has been established.<br>• The anticipated timing for resolving these matters and how this aligns with the proposed development and FID. |
| **4. Need** | | |
| Q4.0.1 | The applicant | **Statement of Need**<br>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.<br>This document should consolidate relevant points from the SoR and PS, but it should also address, amongst other things, the following points:<br>• UK future electricity requirements and what role would solar farms play, if any, in helping to meet any increases in demand.<br>• Additional detail on the reasons for the scale of the proposed solar farm.<br>• 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. |
| **5. Site selection and alternatives** | | |
| Q5.0.1 | The applicant | **Flexibility of Order Limits**<br>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].<br>• Is the applicant any closer to narrowing down the scope of these options?<br>• 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? |
| Q5.0.2 | National Grid Electricity Transmission | **Tee-in connection**<br>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**<br>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. |

| ExQ1 | Question to: | Question: |
|---|---|---|
| | | 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.<br>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. |
| Q5.0.4 | The applicant | **Area of search**<br>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. |
| **6.** | **Compulsory acquisition, temporary possession and other land or rights considerations** | |
| **6.0** | **Overarching Case** | |
| Q6.0.1 | The applicant | **Compliance with Ministry of Housing, Communities and Local Government Guidance**<br>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. |
| Q6.0.2 | The applicant | **Diligent enquiry into land interests**<br>Do you envisage any changes to the application which might engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations)? |
| Q6.0.3 | The applicant | **Reasonable alternatives to compulsory acquisition**<br>In the light of the Compulsory Acquisition (CA) Guidance, in particular paragraph 8:<br>• How can the ExA be assured that all reasonable alternatives to CA, including modifications to the scheme, have been explored?<br>• 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. |
| Q6.0.4 | The applicant | **Reasonable alternatives to Compulsory Acquisition**<br>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 be sought as part of an order granting development consent if attempts to acquire by agreement fail.<br>• Please demonstrate the applicant's compliance with this aspect of the CA Guidance.<br>• 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? |
| Q6.0.5 | The applicant | **Accuracy of the Book of Reference, Land Plans and points of clarification**<br>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. |
| Q6.0.6 | Affected persons and interested parties | **Accuracy of the Book of Reference, Land Plans and points of clarification**<br>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.<br><br>**Environment Agency position:** We note the Book of Reference highlights the Environment Agency as a Category 2 party for Plot nos. A1-3 and A1-9 and we are currently seeking to confirm our position on this matter. |
| Q6.0.7 | The applicant | **Scope and purpose of Compulsory Acquisition powers**<br>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.<br>Please explain in further detail:<br>• The need to seek such a wide-ranging power and why all such rights and easements cannot be specifically identified. |

| ExQ1 | Question to: | Question: |
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| | | • 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?<br>• The nature and extent of any delay to the project that might otherwise result.<br>• What alternatives to this approach have been explored? |
| Q6.0.8 | The applicant | **Whether a compelling case in the public interest exists**<br>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.<br>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.<br>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? |
| Q6.0.9 | The applicant | **Whether a compelling case in the public interest exists**<br>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.<br>• 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?<br>• 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? |
| Q6.0.10 | The applicant | **Whether a compelling case in the public interest exists**<br>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.<br>Please provide further details, with examples where available of:<br>• How has such engagement helped to shape the proposals and enabled the applicant to make changes to designs to minimise the private loss?<br>• How has the direct engagement given the applicant a better understanding of the direct and indirect impacts on persons with affected land interests?<br>• Please provide detail, where available, of any direct and indirect impacts thereby identified. |
| Q6.0.11 | The applicant | **Whether a compelling case in the public interest exists**<br>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? |
| Q6.0.12 | The applicant | **Justification for interfering with the Human Rights of those with an interest in the land affected**<br>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? |
| Q6.0.13 | The applicant | **Justification for interfering with the Human Rights of those with an interest in the land affected**<br>In relation to the applicant's duties under s149 of the Equalities Act 2010:<br>• 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.<br>• Have any APs been identified as having protected characteristics? |
| Q6.0.14 | The applicant | **Justification for interfering with the Human Rights of those with an interest in the land affected**<br>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.<br>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? |
| Q6.0.15 | The applicant | **Justification for interfering with the Human Rights of those with an interest in the land affected** |

| ExQ1 | Question to: | Question: |
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| | | 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.<br>• How has the proportionality test been undertaken?<br>• Explain further the proportionate approach which has been taken in relation to each plot? |
| Q6.0.16 | The applicant | **Scope and purpose of the Compulsory Acquisition powers**<br>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.<br>• Please provide an indication of the anticipated content and/ or an initial draft of any restrictive covenants intended to be imposed.<br>• Should a requirement for consultation with relevant owners/ occupiers as regards the drafting of any such restrictive covenants be imposed? |
| Q6.0.17 | Lincolnshire County Council<br>South Holland District Council | **Scope and purpose of the Compulsory Acquisition powers**<br>Are you aware of:<br>• Any reasonable alternatives to CA or TP for land sought by the applicant?<br>• 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**<br>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. |
| Q6.0.19 | The applicant | **Whether adequate funding is available**<br>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? |
| Q6.0.20 | The applicant | **Whether adequate funding is available**<br>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? |
| Q6.0.21 | The applicant | **Whether adequate funding is available**<br>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.<br>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. |
| Q6.0.22 | The applicant | **Whether adequate funding is available**<br>Please confirm whether the cost estimate provided in the FS [APP-033] includes the full costs associated with the decommissioning of the proposed development. |
| Q6.0.23 | The applicant | **Funding and accounts**<br>Please provide annual financial statements dated 31 December 2025, including balance sheets, for Bagnell Energy Ltd. Please provide unredacted and redacted versions. |
| Q6.0.24 | The applicant | **Funding Statement**<br>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.<br>Please also provide detail of the 6-gigawatt pipeline of projects within the UK, as stated at paragraph 2.1.4 of the FS. |
| Q6.0.25 | The applicant | **Other matters** |

| ExQ1 | Question to: | Question: |
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| | | In the light of the CA Guidance, paragraph 19, please demonstrate:<br>• How potential risks or impediments to implementation of the scheme have been properly managed.<br>• 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. |
| Q6.0.26 | The applicant | **Neighbourhood Planning Act 2017**<br>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?<br>As examples:<br>• 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?<br>• 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?<br>• 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? |
| Q6.0.27 | The applicant | **Grid connection**<br>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.<br>Please confirm whether any alternative grid connections are likely to be/ are available to the applicant outside of the Weston Marsh locality? |
| Q6.0.28 | The applicant | **Limits of deviation**<br>In general, the flexibility given by the proposed LoD to accommodate detailed design development, ground conditions and construction practicalities is understood.<br>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. |
| Q6.0.29 | The applicant | **Land Rights Tracker (LRT)**<br>Where relevant, please re-insert 'Written representation reference number', 'Other document reference number' and 'Applicant's response references' into the LRT [REP1-012].<br>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. |
| Q6.0.30 | The applicant | **Schedule of Changes to Book of Reference**<br>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. |
| **6.1** | **Statutory Undertakers** | |
| Q6.1.1 | All Statutory Undertakers | **Planning Act 2008**<br>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.<br><br>**Environment Agency response:** We are satisfied that updates to the Land Plan REP1-004 and Book of Reference REP1-011 reflect that no compulsory purchase of EA-owned land is required. S127 and s138 therefore are not relevant to EA-owned land. |

| ExQ1 | Question to: | Question: |
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| Q6.1.2 | The applicant | **Planning Act 2008**<br>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. |
| Q6.1.3 | National Grid Electricity Transmission | **Restriction of Compulsory Acquisition powers**<br>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. |
| Q6.1.4 | The applicant | **Spalding Energy Company Limited (InterGen)**<br>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. |
| **6.2** | **Individual Affected Persons** | |
| Q6.2.1 | The applicant | **Andrew Martin King, Elizabeth Mary McRoberts, Frederick David King**<br>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?<br>If no further communication has taken place, please explain what steps, if any, the applicant intends to take to attempt to progress discussions. |
| Q6.2.2 | The applicant | **Carlton James Lane**<br>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. |
| **6.3** | **Crown Land and Special Category Land** | |
| Q6.3.1 | Lincolnshire County Council<br>South Holland District Council | **Section 131 and Section 132 of PA2008**<br>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**<br>Please confirm why CA is no longer sought over plot A11-10. |
| Q6.3.3 | The applicant | **Crown Land**<br>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. |
| **7.** | **The draft Development Consent Order** | |
| **7.0** | **General** | |
| Q7.0.1 | The applicant | **Timescales**<br>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.<br>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. |
| Q7.0.2 | The applicant | **Temporary possession of land**<br>Please explain why the dDCO [REP1-006] does not include a schedule identifying the land in respect of which temporary possession may be taken. |
| Q7.0.3 | The applicant | **Order Limits definition**<br>Please explain why the definition of 'OL' does not expressly include land identified on the Land Plans [REP1-004] and [REP1-005]. |
| Q7.0.4 | The applicant | **Limits of Deviation: Cable Sealing End Compounds** |

| ExQ1 | Question to: | Question: |
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| | | 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’. |
| Q7.0.5 | The applicant | **Construction parameters**<br>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]. |
| Q7.0.6 | The applicant | **Schedule query**<br>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. |
| Q7.0.7 | The applicant | **Time period referencing**<br>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. |
| Q7.0.8 | The applicant | **Timescales**<br>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.<br>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. |
| Q7.0.9 | The applicant | **Legal entities**<br>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. |
| **7.1** | **Parts 1 to 6 – Articles** | |
| Q7.1.1 | The applicant | **Part 1 Article 2 (Interpretation)**<br>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? |
| Q7.1.2 | The applicant | **Part 1 Article 2 (Interpretation)**<br>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. |
| Q7.1.3 | The applicant | **Part 2 Article 8 (Defence to proceedings in respect of statutory nuisance)**<br>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. |
| Q7.1.4 | The applicant | **Part 3 Article 10 (Application of the permit scheme)**<br>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? |
| Q7.1.5 | Lincolnshire County Council | **Part 3 Article 11 (Power to alter layout, etc., of streets)**<br>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)**<br>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. |

| ExQ1 | Question to: | Question: |
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| Q7.1.7 | The applicant | **Part 3 Article 13 (Temporary closure, restriction or prohibition of use of streets and public rights of way)**<br>Article 13(1)(b) authorises the applicant to allow the use of public rights of way by motor vehicles.<br>• Why is this power necessary?<br>• 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?<br>• Where in the dDCO [REP1-006] is the restoration and reinstatement of these paths, if necessary, secured? |
| Q7.1.8 | The applicant | **Part 3 Article 13 (Temporary closure, restriction or prohibition of use of streets and public rights of way)**<br>Article 13(2) gives access for pedestrian to premises.<br>• What about pedestrians with vehicles needing to access premises or houses?<br>• If vehicles are temporarily unable to access premises, how will this displacement be managed, including any displaced parking in the area?<br>• 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. |
| Q7.1.9 | The applicant<br>Lincolnshire County Council | **Part 3 Article 17 (Traffic regulation measures)**<br>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. |
| Q7.1.10 | Lincolnshire County Council | **Part 3 Article 17 (Traffic regulation measures)**<br>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)**<br>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?<br>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. |
| Q7.1.12 | The applicant | **Part 5 Article 21 (Compulsory acquisition of land)**<br>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. |
| Q7.1.13 | The applicant | **Part 5 Article 21 (Compulsory acquisition of land)**<br>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. |
| Q7.1.14 | The applicant | **Part 5 Article 25 (Private rights)**<br>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?<br>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. |
| Q7.1.15 | The applicant | **Part 5 Article 31 (Temporary use of land for constructing the authorised development)**<br>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 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:<br>• notice periods<br>• the period for which temporary possession is required |

| ExQ1 | Question to: | Question: |
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| | | • 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. |
| Q7.1.16 | All Statutory Undertakers | **Part 5 Article 33 (Statutory undertakers)**<br>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.<br><br>Environment Agency response : We are satisfied with this Article. |
| Q7.1.17 | The applicant | **Part 6 Article 40 (Felling or lopping of trees and removal of hedgerows)**<br>Can the applicant:<br>• 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?<br>• 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?<br>• 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?<br>• 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?<br>• 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.<br>• 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" |
| Q7.1.18 | The applicant | **Part 6 Article 41 (Trees subject to tree preservation orders)**<br>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. |
| **7.2 Schedule 1 – Authorised development** | | |
| Q7.2.1 | The applicant | **Associated development**<br>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.<br>Additionally, clarify how each element is directly associated with the main development, is subordinate to it, and necessary for construction and/ or operation. |
| Q7.2.2 | The applicant | **Cable sealing end compounds – Work Nos. 10, 12 and 14**<br>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. |
| Q7.2.3 | The applicant | **Cable sealing end compounds – Work Nos. 10 and 12**<br>Please explain why permanent compounds and associated security fencing and gates and access road are required. |
| Q7.2.4 | The applicant | **Overhead electric line – Work No. 14** |

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| | | 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.<br>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 No. 14 would not be limited to a single predefined "Scenario Two" and that a range of alternative connection arrangements could be required.<br>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. |
| Q7.2.5 | The applicant | **Work No. 3B**<br>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? |
| Q7.2.6 | The applicant | **Work No. 5**<br>Should Work No.5(a) also include reference to Works No.6? |
| Q7.2.7 | The applicant | **Work No. 11**<br>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. |
| Q7.2.8 | The applicant | **Work No. 16**<br>Given their temporary nature, please amend the title of Work No.16 to "Grid Connection Corridor Temporary Site Compounds". |
| Q7.2.9 | The applicant | **Solar Generating Station Temporary Site Compounds**<br>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. |
| Q7.2.10 | Lincolnshire County Council<br>South Holland District Council<br>The applicant | **Schedule 1 Article 3**<br>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.<br>To the applicant: Please confirm which of the associated development works would be subject to the proposed design parameters [REP1-055]? |
| **7.3** | **Schedule 2 – Requirements** | |
| Q7.3.1 | The applicant | **General**<br>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?<br>The ExA suggest this phrase is amended to 'must be in accordance with'. If this wording is not to be used, please provide justification. |
| Q7.3.2 | The applicant<br>Lincolnshire County Council<br>South Holland District Council | **Construction working hours**<br>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.<br>To LCC and SHDC – Please confirm whether such a requirement is necessary? If not, please justify. |
| Q7.3.3 | The applicant | **Requirement 2 (Commencement of the authorised development)**<br>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 |

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| | | DCOs. In particular, please identify additional project-specific circumstances, over and above those already listed, which would necessitate the additional two-year period. |
| Q7.3.4 | The applicant | **Requirement 4 (Community liaison group)**<br>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.<br>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? |
| Q7.3.5 | The applicant | **Requirement 5 (Detailed design approval)**<br>Please consider restructuring R5(1) including:<br>• 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,<br>• At (g) splitting refuse or other storage units, fencing, signs and lighting into their own sub-category and not placed together,<br>• Confirm why drainage, water, power and communication cables and pipelines have not been included within this list.<br>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.<br>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. |
| Q7.3.6 | The applicant | **Requirement 7 (Landscape and ecology management plan) and Requirement 8 (Biodiversity Net Gain)**<br>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. |
| Q7.3.7 | The applicant | **Requirement 7 (Landscape and ecology management plan)**<br>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:<br>• What 'part (h)' and 'part (i)' are referring to,<br>• How the wording of the requirement would enable advance planting for the purposes of screening. |
| Q7.3.8 | The applicant | **Requirement 8 (Biodiversity Net Gain)**<br>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'. |
| Q7.3.9 | The applicant | **Requirement 11 (Archaeology)**<br>Please explain why a final archaeological mitigation and management strategy is to be submitted and not a management plan. |
| Q7.3.10 | The applicant | **Requirement 12 (Construction environmental management plan)**<br>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:<br>• 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.<br>• 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.<br>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)? |

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| Q7.3.11 | The applicant | **Requirement 14 (Waste management plan)**<br>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? |
| Q7.3.12 | The applicant | **Requirement 16 (Permissive path)**<br>Should 16(2) read "The permissive path must be maintained and accessible by the public permitted for 364 days…"? |
| Q7.3.13 | Lincolnshire County Council | **Requirement 20 (Skills, supply chain and employment)**<br>Please review R20(3) and confirm whether the wording is necessary. |
| Q7.3.14 | South Holland District Council<br>National Highways | **Requirement 21 (Decommissioning and restoration)**<br>Please confirm whether you wish to be a consultee in respect of R21? |
| **7.4** | **Schedule 3 – Legislation to be disapplied** | |
| Q7.4.1 | All local authorities<br>Natural England<br>Environment Agency<br>All Statutory Undertakers | **Disapplication of legislative provisions**<br>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.<br><br>**Environment Agency response: Article 7 (1) (f)**. We have established that there will be no flood risk activities associated with the scheme that will require regulation under the Environmental Permitting Regulations 2016. Updated plans together with commitments secured in the outline CEMP, OOEMP and DEMP demonstrate that the operational scheme is set back from flood defence assets and main rivers. Thus disapplication is not required.<br>Article 7 (1) (d). We are still working to confirm whether we are satisfied that the Water Resources Act 1991 can be disapplied. |
| **7.5** | **Schedule 10 – Hedgerows to be removed, managed or affected** | |
| Q7.5.1 | The applicant | **Parts 1 and 2**<br>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. |
| Q7.5.2 | The applicant | **Part 1**<br>Please correct the Hedgerows Regulations and Tree Preservation Order Plan – Section A [APP-026] for:<br>• Hedgerow AH186 is listed as a hedge to be removed. This is not labelled.<br>• Hedgerow AH1017 is listed as a hedge to be removed. This is not labelled.<br>• Hedgerow AH1014 is listed as a hedge to be removed however it is only shown to the overhead line.<br>• 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.<br>• Hedgerow AH1001 is listed as a hedge to be removed. This is not labelled.<br>• Please confirm what the green triangles represent. |
| Q7.5.3 | The applicant | **Part 2**<br>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. |
| Q7.5.4 | The applicant | **Part 3**<br>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. |

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| **7.6** | **Schedule 11 – Documents and plans to be certified** | |
| Q7.6.1 | The applicant | **Part 1**<br>Please include the 'Outline archaeological mitigation and management strategy' in part 1 of schedule 11.<br>Additionally, the ExA requests that schedule 11 is divided into the following four parts:<br>• Part 1 – documents forming the environmental statement to be certified<br>• Part 2 – examination documents forming part of the environmental statement to be certified<br>• Part 3 – other documents to be certified<br>• Part 4 – substitute and supplementary documents |
| **7.7** | **Schedule 13 – Protective Provisions** | |
| Q7.7.1 | All Statutory Undertakers | **Acquisition of Statutory Undertakers' Land**<br>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.<br>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.<br><br>**Environment Agency response:** We have established that there will be no flood risk activities associated with the scheme that will require regulation under the Environmental Permitting Regulations 2016. Protective Provisions are not required and can be removed from the dDCO. |
| **7.8** | **Schedule 14 – Procedure for discharge of requirements** | |
| Q7.8.1 | The applicant | **Appeals**<br>Under paragraph 4(2)(a) should a time period be specified within which the undertaker can make an appeal? |
| **7.9** | **Controlling Documents for the dDCO** | |
| Q7.9.1 | The applicant | **Schedule of Other Consents and Licences**<br>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? |
| Q7.9.2 | The applicant | **Side Agreements and Legal Agreements**<br>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. |
| **8.** | **Air quality** | |
| Q8.0.1 | The applicant | **Decommissioning phase**<br>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. |
| Q8.0.2 | The applicant | **Air quality general**<br>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. |
| Q8.0.3 | The applicant | **Dust** |

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| | | 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]. |
| Q8.0.4 | The applicant | **Emission factor**<br>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. |
| **9.** | **Biodiversity, ecology and natural environment (Environment Impact Assessment only)** | |
| Q9.0.1 | Lincolnshire County Council<br>Lincolnshire Wildlife Trust<br>Natural England | **Adequacy of surveys**<br>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<br>Lincolnshire Wildlife Trust<br>Natural England | **Skylark (and other ground nesting birds)**<br>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:<br>- That the estimation of the number of skylark territories is appropriate and assessed in line with current policy and guidance. If not, why not?<br>- That the proposal for 0.2 territories per hectare is consistent with current policy and guidance. If not, why not?<br>- 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.<br>- 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<br>Lincolnshire Wildlife Trust<br>Natural England | **Lake effects**<br>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**<br>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. |
| Q9.0.5 | The applicant | **Environmental net gain statement**<br>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. |
| Q9.0.6 | The applicant | **Environmental Improvement Plan**<br>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. |
| Q9.0.7 | The applicant | **Habitat connectivity** |

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| | | 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.<br>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. |
| Q9.0.8 | The applicant | **Ornithological surveys – vantage points**<br>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. |
| **10. Climate change** | | |
| Q10.0.1 | The applicant | **Lifecycle greenhouse gas assessment**<br>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).<br><br>Please signpost where the following can be found or provide this information:<br>• How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures.<br>• How operational emissions have been reduced as much as possible through the application of Best Available Technique (BAT) for that type of technology.<br>• Whether and how any residual GHG emissions will be offset or removed.<br>• Where opportunities have been looked for within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions.<br>• Where a GHG Reduction Strategy can be found. If this not available, please provide one or justify why this is not necessary.<br><br>The ExA note that the project would contribute 2.1% of the electrical supply sectoral carbon budget in the ninth carbon budget.<br>• Is this considered to be significant? If not, why not?<br>• Should this be incorporated in an assessment of cumulative effects for the ninth carbon budget for the electricity supply sector? If not, why not? |
| Q10.0.2 | The applicant | **Assumptions in the lifecycle greenhouse gas assessment**<br>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:<br>• Signpost where this information can be found. If it is not available, please provide this.<br>• This should include a response to lichen within the OL acting as a carbon sink [RR-186].<br><br>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:<br>• Set out where a qualitative approach has been applied and how this has been incorporated in the lifecycle GHG assessment.<br><br>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:<br>• Explain the implications of a ‘latest’ commencement date for the outcomes of the Lifecycle GHG Assessment. |

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| | | 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:<br>• 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.<br>• 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.<br>• Provide any sensitivity analysis undertaken on the assumptions input to the assessment. |
| Q10.0.3 | The applicant | **Embedded mitigation**<br>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.<br>• 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?<br>• Several of the mitigation measures include the phrase 'where reasonably practicable'. How is it proposed that these proposals are enforced based on this wording? |
| **11. Habitats Regulations Assessment** | | |
| Q11.0.1 | The applicant<br>Natural England | **Qualifying features – Nene Washes Special Protection Area – assessment of qualifying features in different seasons**<br>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. |
| Q11.0.2 | Lincolnshire Wildlife Trust<br>Natural England | **Qualifying features – whooper swan**<br>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.<br>• 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.<br>• 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<br>Natural England | **Qualifying features – The Wash Special Protection Area and Ramsar site and Nene Washes Ramsar site – presence of golden plover**<br>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:<br>• 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?<br>• 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?<br>• 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, |

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| | | a wide range of 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.<br>• 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. |
| Q11.0.4 | The applicant<br>Natural England | **Qualifying features – consideration of possible future Ramsar criterion**<br>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.<br>Can the applicant and NE confirm the status of these species and the requirement to be assessed in the HRA Report? |
| Q11.0.5 | The applicant | **Likely significant effects – figure of areas assessed for the potential to be functionally linked land**<br>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.<br>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]. |
| Q11.0.6 | Natural England | **Likely significant effects – additional assessment of functionally linked land**<br>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**<br>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 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? |
| Q11.0.8 | The applicant | **Likely significant effects conclusions – air quality**<br>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.<br>Please detail how you have considered the standing advice, setting out the implications for the proposed development and examination of this application. |
| Q11.0.9 | The applicant<br>Natural England<br>(and all interested parties) | **HRA implications of permitted preliminary works**<br>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].<br>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. |
| Q11.0.10 | The applicant<br>Natural England<br>(and all interested parties) | **HRA implications of the variable grid connection**<br>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]).<br>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. |
| Q11.0.11 | The applicant<br>Natural England<br>(and all interested parties) | **HRA implications of the optionality of Work No. 14**<br>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]. |

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| | | 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.<br>**Environment Agency response:** Otters are present as a qualifying feature in the functionally-linked SAC (The Wash and North Norfolk Coast), but the applicant has outlined appropriate avoidance and mitigation measures and we do not believe there would be HRA implications regarding otters. |
| Q11.0.12 | The applicant<br>Natural England | **AEoI conclusions – permissions for the installation of aerial markers/ bird diverters and security of this mitigation measure**<br>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'.<br>• 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 requirement do you propose in included in the OOEMP to secure the required monitoring and adaptive measures?<br>• Applicant: Confirm if you are content to include consultation with NE on discharge of Requirement 13. If so, provide your proposed wording.<br>• Applicant: Comment on NE's proposals for best practice monitoring and adaptive measures. If possible, provide your proposed wording to secure these requirements. |
| Q11.0.13 | The applicant | **AEoI conclusions – possible future amendments to diverters based on monitoring**<br>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".<br>• 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.<br>• 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? |
| Q11.0.14 | The applicant | **AEoI conclusions – implications of the use of aerial markers/ bird diverters within the in-combination assessment**<br>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 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? |
| Q11.0.15 | Natural England | **Annex A – Summary of Natural England's position on HRA matters**<br>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:<br>• 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?<br>• 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?<br>• 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?<br>• 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? |
| **12. Historic environment** | | |
| Q12.0.1 | The applicant | **Micro-siting**<br>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 |

| ExQ1 | Question to: | Question: |
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| | | 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. |
| Q12.0.2 | The applicant | **Embedded mitigation**<br>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. |
| Q12.0.3 | The applicant | **Embedded mitigation**<br>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. |
| Q12.0.4 | The applicant<br>Lincolnshire County Council<br>Historic England | **Embedded mitigation**<br>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.<br>To LCC and Historic England (HE): Please confirm whether a 20m buffer zone is considered acceptable. |
| Q12.0.5 | The applicant | **Archaeology**<br>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.<br>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].<br>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 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. |
| Q12.0.6 | Historic England | **Archaeology**<br>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 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**<br>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. |
| Q12.0.8 | The applicant | **Archaeology**<br>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. |
| Q12.0.9 | The applicant | **Archaeology**<br>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. What approach would be taken to ensure that the fencing itself does not cause damage to archaeological heritage assets? |
| Q12.0.10 | The applicant | **Archaeology** |

| ExQ1 | Question to: | Question: |
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| | | 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 substation in parcel C is located in Archaeological Zone 1) and what alternatives to that location were explored to avoid such archaeological deposits. |
| Q12.0.11 | The applicant | **Archaeology – Zone 2**<br>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. |
| Q12.0.12 | The applicant | **Archaeology – zones of archaeological potential**<br>ES Chapter 8 [REP1-016] 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 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. |
| Q12.0.13 | The applicant | **Archaeology – construction phase**<br>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?<br>Please explain why field D5-02 is included in Zone 5? |
| Q12.0.14 | Lincolnshire County Council | **Archaeology – construction phase**<br>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**<br>ES Chapter 8 [REP1-016] paragraphs 8.9.34 – 8.9.36. Can the applicant please explain:<br>• What does ‘the area west of’ mean for pylons 4SV10, 4SV27 and 4SV35? Please define how far west.<br>• What does ‘the areas around 4SV10 etc’ mean?<br>• 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. |
| Q12.0.16 | The applicant | **Archaeology – Grid Connection Route**<br>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 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. |
| Q12.0.17 | Lincolnshire County Council | **Archaeology – decommissioning phase**<br>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.<br>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.<br>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: |
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| | | 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. |
| Q12.0.19 | The applicant | **Additional mitigation and enhancement measures**<br>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. |
| Q12.0.20 | The applicant | **Heritage Setting Assessment**<br>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 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? |
| Q12.0.21 | The applicant | **Historic Environmental Desk Based Assessment**<br>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? |
| Q12.0.22 | Lincolnshire County Council | **Historic Environmental Desk Based Assessment**<br>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**<br>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. |
| Q12.0.24 | The applicant<br>Lincolnshire County Council | **Historic Environmental Desk Based Assessment**<br>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].<br>To the applicant: Please confirm when archaeological evaluation works for the inter-array between parcels A and B are anticipated to be conducted.<br>To LCC: Please comment on the approach taken for the inter-array between parcels C and D for archaeological evaluation. |
| Q12.0.25 | The applicant | **Historic Environmental Desk Based Assessment**<br>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. |
| Q12.0.26 | Lincolnshire County Council | **Historic Environmental Desk Based Assessment**<br>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. |
| **13. Human health** | | |
| Q13.0.1 | Lincolnshire County Council | **Need for Health Impact Assessment** |

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| | | 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].<br>Please can LCC:<br>• Confirm if the human health assessment [APP-061] meets the requirements of the up-to-date guidance.<br>• Signpost to the policy requirement for an HIA.<br>• 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**<br>LCC has requested that the human health assessment considers vulnerable populations, controls during the construction phase, a full assessment of the effects on mental wellbeing, whether the effects of electric and magnetic fields (EMF) will comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines and maximisation of health and access opportunities [REP1-106]. In [REP1-074] the applicant has signposted to where these issues are assessed in the application, including reference to the EMF Compliance Report [APP-273]<br>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? |
| **14. Land use and soils** | | |
| Q14.0.1 | Lincolnshire County Council<br>The applicant | **Cropping information**<br>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<br>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. |
| Q14.0.2 | The applicant | **Agricultural Land Classification surveys – methodology**<br>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:<br>• 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.<br>• 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.<br>• 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.<br>• 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. |
| Q14.0.3 | The applicant | **Soil management plan – presence of peat**<br>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.<br>• On this basis, how can the applicant be confident at present that there are no peat soils across the whole order limits?<br>• 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? |

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| | | • 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. |
| Q14.0.4 | The applicant | **Soil management plan – potential presence of physical and chemical contamination at reinstatement**<br>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?<br>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? |
| Q14.0.5 | The applicant | **Soil management plan – climate change**<br>Is the potential for climate change impacts a limiting factor in the ability to reinstate the soils to its baseline ALC grading?<br>If so, should the OSMP [REP1-068] updated to include measures to address the potential for climate change to alter soil properties? |
| Q14.0.6 | The applicant | **Soil management plan – decompaction strategy**<br>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. |
| Q14.0.7 | The applicant | **Soil management plan – decompaction strategy**<br>The OSMP [REP1-068] states that the decompaction strategy would not seek to rectify any existing or unrelated soil compaction.<br>• How will the applicant determine what compaction is existing or unrelated?<br>• 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? |
| Q14.0.8 | The applicant | **Soil management plan – use of more than one soil management plan**<br>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".<br>• 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?<br>• 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.<br>• How does the potential provision of more than one SMP relate to the requirement and relevant discharge within the dDCO [REP1-006]? |
| Q14.0.9 | The applicant | **Soil management plan – requirement to establish a grass sward before construction**<br>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.<br>• Why is this only considered a relevant mitigation measure for the SDA and not also the GCR or other works areas?<br>• How long does the applicant consider that the establishment of the grass sward would take?<br>• 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? |
| Q14.0.10 | The applicant | **Soil management plan – material to separate bunds**<br>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?<br>If it is of a material type of another soil or similar, how would the applicant prevent the mixing of this into the stockpiles? |
| Q14.0.11 | The applicant | **Land holding details**<br>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:<br>• name and address of holding<br>• relevant plot(s) number |

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| | | • total size of holding<br>• holding use<br>• breakdown of land classification – by hectare and percentage of holding<br>• summary of proposed activity on holding<br>• loss of land – defined by temporary and/ or permanent and hectare and percentage of holding |
| Q14.0.12 | The applicant | **Animal wellbeing**<br>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.<br>What, if any, measures are necessary to mitigate effects and how will these be secured? |
| Q14.0.13 | The applicant | **Hedgerow planting**<br>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.<br>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. |
| Q14.0.14 | Lincolnshire County Council | **Diversification – Solar Development Area**<br>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**<br>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].<br>Please clarify what is meant by 'several years' and provide an estimated timeframe for soil recovery. |
| 15. | **Landscape and visual** | |
| Q15.0.1 | Lincolnshire County Council<br>South Holland District Council | **Study Area**<br>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**<br>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]. |
| Q15.0.3 | The applicant | **Connection to the National Grid Weston Marsh Substation Note**<br>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 Marsh Substation Note (CNGWMS) [REP1-094], are detailed, in particular to the placement of CSEC within Work 14. |
| Q15.0.4 | The applicant | **Work No. 14 and Cable Sealing End Compounds**<br>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.<br>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 ability to fully assess the potential visual and landscape character effects associated with this part of the proposed development. Can the applicant: |

| ExQ1 | Question to: | Question: |
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| | | • 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.<br>• Provide a Tier 3 visualisation, with photomontages, from representative viewpoints showing the effect of the proposed CSEC positioned within Work No. 14. |
| Q15.0.5 | The applicant | **400kV substation and BESS compound**<br>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<br>• Confirm the overall area in square meters for the 400kV substation and BESS compound.<br>• Confirm what the additional floorspace would be used for.<br>• Explain why the BESS footprint is larger than the 400kV substation footprint. |
| Q15.0.6 | The applicant | **BESS and substations**<br>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. |
| Q15.0.7 | The applicant | **Substations, Cable Sealing End Compounds and other above ground installations**<br>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 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. |
| Q15.0.8 | The applicant | **Watercourse crossings:**<br>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. |
| Q15.0.9 | The applicant | **Landscape and visual effects**<br>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.<br>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.<br>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]. |
| Q15.0.10 | The applicant | **Visual receptors**<br>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.<br>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. |

| ExQ1 | Question to: | Question: |
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| Q15.0.11 | The applicant | **Proposed planting**<br>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.<br>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.<br>• 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 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.<br>• Can the applicant confirm the amount of new tree cover and whether this is standalone or within the proposed hedgerows. |
| Q15.0.12 | The applicant | **Proposed planting**<br>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:<br>• Signpost to where in the documentation it states whether this planting is to be retained beyond the life of the project.<br>• Confirm what is meant by the phrase in Appendix 12-6 [APP-240] that changes to planting would be permanent.<br>• Confirm how the Landscape and Visual Impact Assessment has assessed and considered this planting within its assessment – permanent or temporary. |
| Q15.0.13 | The applicant<br>Lincolnshire County Council<br>South Holland District Council | **Proposed planting**<br>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.<br>To the applicant:<br>• Please explain why defective shrubs in section 5.5 would not to be replaced should they also serve a landscape screening function<br>• Please explain the rationale behind the species mix in table 5-1<br>• 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.<br>• 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?<br><br>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. |
| Q15.0.14 | Lincolnshire County Council | **Proposed planting**<br>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. |
| Q15.0.15 | The applicant | **Advanced Planting**<br>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: |

| ExQ1 | Question to: | Question: |
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| | | • 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].<br>• 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].<br>• 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. |
| Q15.0.16 | The applicant | **Environmental Statement Chapter 12**<br>ES Chapter 12: Landscape and Visual [APP-063] paragraph 12.6.86 is incomplete. Please provide the completed wording for this paragraph. |
| Q15.0.17 | The applicant | **Outline Landscape and Ecological Management Plan**<br>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. |
| Q15.0.18 | The applicant<br>Lincolnshire County Council<br>South Holland District Council | **Photosheets**<br>LCC LIR [REP1-106] Appendix i: Landscape and Visual Review by AAH Consultants.<br>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].<br>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.<br>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]. |
| Q15.0.19 | The applicant | **Viewpoints 2, 5, 6, 8, 10, 13, 15, 20, 21, 27, 30, LCC 2-1, LCC3, LCC8 and LCC9**<br>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. |
| Q15.0.20 | The applicant | **Viewpoint 8**<br>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. |
| Q15.0.21 | The applicant | **Viewpoint 10**<br>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. |
| Q15.0.22 | The applicant | **Photosheets**<br>Please explain the following:<br>• [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].<br>• [APP-133] – Why there are no photosheets provided for viewpoint 6 for the proposed development year 1 and year 15.<br>• [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?<br>• [APP-135] – Why there are no photosheets provided for viewpoint 13 for the proposed development year 1 and year 15. |

| ExQ1 | Question to: | Question: |
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| | | • [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.<br>• [APP-137] – Why the substation is not marked on viewpoint 19 in Parcel D.<br>• [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.<br>• [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.<br>• [APP-140] – Why there are no photosheets provided for viewpoint 26 for the proposed development winter year 1 and year 15.<br>• [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?<br>• [APP-143] – Why there are no photosheets provided for viewpoints LCC2-2 and LCC3 for the proposed development year 1 and year 15.<br>• [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.<br>• [APP145] – Why there is no indication of where the BESS and substation would be located on photosheets for viewpoint LCC7.<br>• [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. |
| Q15.0.23 | Lincolnshire County Council<br>South Holland District Council | **Photosheets – additional winter photograph**<br>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**<br>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:<br>• 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).<br>• Confirm which properties are being referred to in ES Chapter 12 paragraphs 12.7.13, 12.7.14 and 12.7.15 specifically.<br>• 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.<br>• 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.<br>• Signpost to where in the submitted documentation details of the offset distances are provided for the GCR and how these were formulated.<br>• Signpost to where within the application documentation the offset distances for PRoW are detailed and how these have been determined. |
| Q15.0.25 | The applicant | **Residential views**<br>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 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). |
| Q15.0.26 | The applicant | **Residential Visual Amenity Assessment**<br>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:<br>• Step 1 – Define the study area and identify the properties to be assessed.<br>• Step 2 – Evaluate the baseline visual amenity of these properties.<br>• Step 3 – Assess the likely change to this baseline and identify of which properties require further assessment. |

| ExQ1 | Question to: | Question: |
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| | | • 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. |
| Q15.0.27 | The applicant | **Development area and public rights of way**<br>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]. |
| Q15.0.28 | Lincolnshire County Council<br>South Holland District Council | **Landscape Baseline**<br>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**<br>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. |
| Q15.0.30 | The applicant | **Trees**<br>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. |
| Q15.0.31 | The applicant | **Trees**<br>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:<br>• Sheet 5 of 30 – what are the blue areas along the internal access track?<br>• 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?<br>• 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?<br>• Why are assets for the pylons seemingly in one colour but the rest of the pylon assets are not? |
| Q15.0.32 | The applicant | **Trees**<br>Please explain why there is no commitment secured within the OCEMP [REP1-061] to protect against the loss of trees protected by a TPO. |
| Q15.0.33 | The applicant | **Trees**<br>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. |
| Q15.0.34 | The applicant | **Trees**<br>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]. |
| Q15.0.35 | The applicant | **Trees**<br>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 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]. |
| Q15.0.36 | The applicant | **Trees**<br>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]. |

| ExQ1 | Question to: | Question: |
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| Q15.0.37 | The applicant | **Trees**<br>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.<br>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. |
| **16. Noise and vibration** | | |
| Q16.0.1 | The applicant | **Noise general**<br>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. |
| Q16.0.2 | The applicant | **Noise general**<br>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. |
| Q16.0.3 | The applicant | **Overhead Line Noise**<br>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? |
| Q16.0.4 | The applicant | **Horizontal directional drilling**<br>Can the applicant please:<br>• 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 Locations and Distance to Nearest Receptor in ES Chapter 13 [APP-064].<br>• 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].<br>• 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.<br>• Explain to what purpose the HDD works are required at the locations detailed in table 13-25 [APP-064]. |
| Q16.0.5 | South Holland District Council | **Assessment methodology**<br>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**<br>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, 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. |
| Q16.0.7 | The applicant | **Noise modelling**<br>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. |
| Q16.0.8 | The applicant | **Noise and vibration study area** |

| ExQ1 | Question to: | Question: |
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| | | 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:<br>• 300m cited at paragraph 13.4.15 of ES Chapter 13 [APP-064]<br>• 300m for solar and 200m for the GCR cited in paragraph 13.4.16 of ES Chapter 13, or<br>• 50m for construction traffic cited in paragraph 13.4.17 of ES Chapter 13<br>Please provide a figure showing all of the study areas detailed in ES Chapter 13 [APP-064]. |
| Q16.0.9 | South Holland District Council | **Construction noise**<br>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 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**<br>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.<br>Please confirm whether this would be the case for NGA1 at RG60. |
| Q16.0.11 | Applicant | **Construction noise**<br>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. |
| Q16.0.12 | The applicant | **Operational noise**<br>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. |
| Q16.0.13 | The applicant<br>South Holland District Council | **Operational noise**<br>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.<br>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. |
| Q16.0.14 | The applicant | **Operational noise**<br>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. |
| Q16.0.15 | The applicant | **Operational plant noise**<br>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? |
| Q16.0.16 | The applicant | **Overhead line noise criteria for different receptors** |

| ExQ1 | Question to: | Question: |
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| | | 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. |
| Q16.0.17 | The applicant | **Overhead line noise**<br>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.<br>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. |
| Q16.0.18 | The applicant | **Overhead line noise**<br>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.<br>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 [REP1-055]. |
| Q16.0.19 | The applicant | **Road traffic noise**<br>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. |
| Q16.0.20 | The applicant | **Road traffic noise**<br>For ES Appendix 13-3 [APP-246], please explain:<br>• What time period table 4-1: Construction Traffic Noise Assessment Data covers e.g. is this over the course of one day.<br>• 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].<br>• Why L24, L26, L27 and L32 are not included in table 4-3: Cumulative Development Construction Traffic Noise Assessment Results. |
| Q16.0.21 | The applicant | **Sensitive receptors**<br>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. |
| Q16.0.22 | South Holland District Council | **Mitigation measures during the operational phase**<br>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**<br>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 | South Holland District Council | **Decommissioning noise**<br>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<br>All local authorities | **Construction vibration**<br>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 |

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| | | 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.<br>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.<br>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.<br>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.<br>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. |
| Q16.0.26 | The applicant | **Construction vibration**<br>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. |
| Q16.0.27 | The applicant | **Construction vibration**<br>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. |
| Q16.0.28 | The applicant | **Construction vibration**<br>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?<br>The ExA also requests confirmation of whether RG30 would be expected to experience similar vibration effects as a result of the proposed percussive works. |
| **17. Socio-economic effects** | | |
| Q17.0.1 | The applicant | **Outline Public Rights of Way Management Plan**<br>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. |
| Q17.0.2 | The applicant | **Operational phase - Gross Value Added**<br>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.<br>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. |
| Q17.0.3 | The applicant | **Grazing**<br>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.<br>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. |
| Q17.0.4 | The applicant | **Grazing** |

| ExQ1 | Question to: | Question: |
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| | | 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. |
| Q17.0.5 | The applicant | **Travel time and accommodation**<br>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. |
| Q17.0.6 | The applicant | **Job creation - operation**<br>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.<br>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. |
| Q17.0.7 | The applicant | **Job creation - operation**<br>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. |
| Q17.0.8 | The applicant | **Outline Skills, Supply Chain and Employment Plan – Opportunity 7: Ethical Procurement Policy**<br>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.<br>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? |
| **18.** | **Transportation and traffic** | |
| Q18.0.1 | The applicant | **Junction receptors**<br>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]. |
| Q18.0.2 | The applicant | **Heavy goods vehicle and abnormal indivisible load routing**<br>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.<br>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. |
| Q18.0.3 | The applicant<br>Lincolnshire County Council | **Accesses HR-01 and HR-02**<br>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:<br>• Provide a plan showing the construction work zones for the GCR as referred to in their response.<br>• 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.<br>• 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.<br>• 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.<br><br>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. |

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| Q18.0.4 | The applicant | **Accesses**<br>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.<br>However, use of these accesses is inconsistent with the following figures:<br>• 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.<br>• 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 completed, vehicle movements associated with the operational phase are anticipated to be significantly lower, reflecting the limited nature of the maintenance and inspection works required".<br>• 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.<br><br>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.<br>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. |
| Q18.0.5 | The applicant | **Accesses**<br>Can the applicant please:<br>• 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.<br>• 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.<br>• 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].<br>• 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.<br>• 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. |
| Q18.0.6 | The applicant | **Accesses**<br>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. |
| Q18.0.7 | The applicant | **Abnormal indivisible load accesses**<br>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]. |
| Q18.0.8 | The applicant | **Access point QB-01**<br>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. |
| Q18.0.9 | The applicant | **Access point A16-01** |

| ExQ1 | Question to: | Question: |
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| | | 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. |
| Q18.0.10 | The applicant | **Access point BB-01**<br>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.<br>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. |
| Q18.0.11 | The applicant | **Access points MR-01 and MR03**<br>Please clarify based on the OCTMP [APP-278] annex 2, sheet 18:<br>• Why both these accesses need to remain during the operational phase. Would one access point not be sufficient?<br>• Why access for AILs is required for access point MR-01?<br>• 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? |
| Q18.0.12 | The applicant | **Access points DB-03 and DB-04**<br>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]. |
| Q18.0.13 | The applicant | **Internal access road**<br>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. |
| Q18.0.14 | The applicant | **Inter-Array accesses**<br>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. |
| Q18.0.15 | Peterborough City Council | **Construction traffic**<br>Please comment on the applicant's response within the Relevant Representations Report [REP1-074] on the following:<br>• Page 189 regarding Peterborough City Council's (PCC) request for the traffic survey area to include the A47/A16 junction.<br>• Page 189 regarding PCC's request that Peterborough growth factors are applied for the Peterborough sections of the A16.<br>• 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**<br>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 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. |
| Q18.0.17 | The applicant | **Construction traffic**<br>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. |

| ExQ1 | Question to: | Question: |
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| Q18.0.18 | The applicant | **Construction traffic**<br>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. |
| Q18.0.19 | The applicant | **Construction traffic**<br>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. |
| Q18.0.20 | The applicant | **Construction traffic**<br>Paragraph 5.4.3 and table 5-1 of the OCTMP [APP-278]. Please confirm:<br>• Whether HGV deliveries include AILs.<br>• Whether the numbers provided in table 5-1 are one-way trips or two-way movements.<br>• 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? |
| Q18.0.21 | Lincolnshire County Council | **Suitability of highway network**<br>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.<br>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**<br>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. |
| Q18.0.23 | The applicant | **Passing places**<br>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]. |
| Q18.0.24 | The applicant | **Passing places**<br>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. |
| Q18.0.25 | The applicant | **Operational traffic**<br>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.<br>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.<br>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:<br>• How many two-way vehicle movements would be generated per day from the importation of clean water for the scheme during the operational phase.<br>• How many two-way vehicle movements would be generated per day from the exportation of wastewater for the scheme during the operation phase.<br>• 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.<br>• Please sign post to where this information has been taken account of within the traffic assessment within the ES. |

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| Q18.0.26 | The applicant | **Operational traffic**<br>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 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. |
| Q18.0.27 | The applicant | **Operational traffic**<br>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. 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. |
| Q18.0.28 | The applicant | **Transport Assessment Note**<br>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.<br>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. |
| Q18.0.29 | The applicant | **Heavy goods vehicles**<br>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.<br>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. |
| Q18.0.30 | The applicant | **Heavy goods vehicles**<br>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. |
| Q18.0.31 | The applicant | **Heavy goods vehicles**<br>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. |
| Q18.0.32 | The applicant | **Large loads**<br>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]. |
| Q18.0.33 | The applicant | **Baseline traffic flows**<br>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? |
| Q18.0.34 | The applicant | **Traffic assessment**<br>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])? |
| Q18.0.35 | The applicant | **Traffic assessment**<br>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. |
| Q18.0.36 | The applicant | **Traffic assessment** |

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| | | 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. |
| Q18.0.37 | Lincolnshire County Council | **Traffic assessment**<br>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**<br>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<br>Lincolnshire County Council | **Road safety assessment for link and junction receptors**<br>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.<br>To LCC: Please comment on the conclusions reached regarding road safety and HGVs within table 15-32 and paragraphs 15.8.58 – 15.8.61 of ES Chapter 15: Traffic and Transport [APP-066]. |
| Q18.0.40 | The applicant | **Workforce travel**<br>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. |
| Q18.0.41 | The applicant | **Outline Construction Traffic Management Plan**<br>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. |
| Q18.0.42 | The applicant | **Outline Construction Traffic Management Plan**<br>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? |
| Q18.0.43 | The applicant | **Outline Construction Traffic Management Plan**<br>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. |
| Q18.0.44 | The applicant<br>Lincolnshire County Council | **Outline Construction Traffic Management Plan**<br>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.<br>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. |
| Q18.0.45 | The applicant | **Road condition surveys**<br>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. |

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| | | 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. |
| Q18.0.46 | The applicant | **Grid Connection Route crossing points**<br>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. |
| Q18.0.47 | The applicant | **Inter-Array and Grid Connection Route crossing points**<br>Please clarify the following based on information in table 7-1 within the OCTMP [APP-278]:<br>• 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.<br>• Why Moulton Chapel Road has a partial closure when Delgate Bank is identified as a full closure.<br>• Why West Gate and Whirl Gate are identified for full closure when other crossing points are identified for partial closure. |
| Q18.0.48 | The applicant<br>Lincolnshire County Council | **Cumulative impact**<br>To the applicant: Please clarify:<br>• 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.<br>• What the percentage increases are relative to.<br>• 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.<br>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. |
| Q18.0.49 | The applicant | **Public rights of way**<br>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. |
| Q18.0.50 | The applicant | **Outline Operational Environmental Management Plan**<br>Table 3-12: Traffic and Access of the OOEMP [REP1-063]. Please check the reference to ES figure 2-6 [APP-078] is correct. |
| **19.** | **Water environment (including Water Framework Directive Assessment and Flood Risk Assessment)** | |
| Q19.0.1 | Anglian Water Services<br>Environment Agency | **Water Supply Strategy**<br>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.<br><br>**Environment Agency response:** Please see detailed response in D3 submission**.** We are satisfied that the applicant has considered what opportunities and limitations there are for water supply in this region. There are additional options that are not currently being considered which include de-minimus abstraction (outside of regulation) and licence trading which could also be considered as part of a multi source supply approach. |
| Q19.0.2 | The applicant<br>Environment Agency | **Foul water**<br>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'.<br>• The applicant must confirm how many cesspits would be required during both construction and operation, and where these would be located. |

| ExQ1 | Question to: | Question: |
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| | | • Please can the Environment Agency (EA) confirm that the principle of discharging to cesspits is acceptable to them?<br>• 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.<br><br>**Environment Agency response:** We can confirm that the principle of discharging to cesspits is acceptable. We advise that the siting of cesspits be confirmed to avoid areas of shallow groundwater. |
| Q19.0.3 | The applicant<br>Environment Agency<br>Any interested parties | **Scope of Environmental Statement assessment – secondary aquifers**<br>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".<br>• Please can the applicant provide a map of the secondary aquifer(s) and confirm that there are no private abstractions from these?<br>• The EA and any other IPs are invited to provide comments in relation to the conclusions of the ES on this matter.<br><br>**Environment Agency response:** Small areas of Secondary undifferentiated aquifers are present beneath the site. These are limited in extent and with the pollution prevention mitigation measures proposed we are satisfied that risks to these receptors can be managed. Chapter 11 of the ES details the information requests that were submitted in relation to private water supplies within the study area. No private water supplies were identified. We are satisfied that the conclusions reached in the ES in relation to groundwater protection. |
| Q19.0.4 | The applicant | **Water quality**<br>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:<br>• How this setup works in relation to protection from flooding.<br>• How containment of any contaminated water is ensured. |
| Q19.0.5 | Environment Agency | **Water quality monitoring, baseline dataset and mitigation measures**<br>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.<br><br>**Environment Agency response:** Please see our detailed submission at D3. Most of these issues have now been resolved. However EA34 regarding water quality monitoring, EA36 regarding water quality baseline, and EA30 regarding fuel, chemical and oil storage remain unresolved. |
| Q19.0.6 | The applicant<br>Environment Agency | Water Framework Directive<br>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]**.<br><br>**Environment Agency response:**<br>Please see our detailed submission for Deadline 3.<br>Regarding EA25 and EA26 concerning fish scoped out of EIA – there has been no progress since our submission at Deadline 2. We are satisfied with the overall approach, and now await review of the revised oCEMP to resolve these issues.<br>Regarding EA27 – we welcome the use of clear span crossings on permanently wet waterbodies/watercourses. Where bell mouth crossings are proposed, culverts 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. We await review of the revised oCEMP to resolve this issue.<br>EA28 – We agree with the conclusion of the WFD assessment, subject to the inclusion of these requested updates in the oCEMP.<br>EA29 – We await the Applicant's response regarding the siting of drainage outfall pipes to prevent eel entrapment. |

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| Q19.0.7 | Environment Agency | **Sensitivity testing for climate change**<br>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.<br><br>**Environment Agency response:**<br>The Environment Agency's *Flood Risk Assessments: Climate Change Allowances* guidance advises that, for Essential Infrastructure, the Higher Central climate change allowance should be used to define the design flood event. For projects classified as Nationally Significant Infrastructure Projects (NSIPs), the guidance also recommends assessing a high-impact (Credible Maximum) climate change scenario as a sensitivity test to understand the resilience of the development should more severe climate change materialise. In the context of fluvial flood risk, the Upper climate change allowance should be used to define the Credible Maximum scenario. For tidal flood risk, the H++ scenario should be applied, which involves adding 1.9 m of sea level rise to the design tidal flood level to 2100.<br>In the context of fluvial flood risk, the 1% (1 in 100) annual exceedance probability (AEP) event, with both Higher Central and Upper climate change allowances applied, is typically used to define the design flood event and Credible Maximum scenario respectively. However, for Meridian Solar Farm, the Applicant has adopted a slightly different approach. The Applicant has used the rarer 0.1% (1 in 1000) AEP event with the Higher Central climate change allowance to determine the design flood level. This reflects the South East Lincolnshire Standing Advice, which recommends the use of the 0.1% (1 in 1000) AEP plus climate change event as the design standard, rather than the 1% (1 in 100) AEP plus climate change event. The Standing Advice does not specify consideration of a separate Credible Maximum scenario. Consequently, the Applicant has not presented a separate assessment of the 0.1% (1 in 1000) AEP event with the Upper climate change allowance applied.<br>In considering the implications of this approach, it is important to understand both the sensitivity of flood levels to increases in flow and how the Applicant's adopted design event compares with the fluvial Credible Maximum scenario typically used under national guidance, namely the 1% (1 in 100) AEP event with the Upper climate change allowance applied.<br>For the River Welland, the hydraulic modelling indicates that flood levels are relatively insensitive to increases in flow due to the significant attenuation provided by the washes. This is demonstrated by the limited variation in peak water levels reported in Table 2 and the stage hydrographs presented in Figures 4 to 7 of the Applicant's *River Welland Breach Modelling Report* (Appendix 11-3 Annex B, examination library reference REP1-048). Consequently, increasing the climate change allowance from +28% (Higher Central) to +53% (Upper) for the 0.1% AEP event would not be expected to result in a material increase in flood levels or flood risk across the site.<br>Furthermore, the development has been designed to remain resilient during residual breach scenarios, providing an additional degree of resilience beyond the design event itself. In this respect, the adopted design standard already incorporates a substantial level of conservatism.<br>A similar conclusion can be drawn for the Postland and South Holland Main Drain catchments. The design scenario modelled by the Applicant, namely the 0.1% (1 in 1000) AEP event with the Higher Central (+28%) climate change allowance applied, incorporates substantially greater flows than would ordinarily be used to represent the Credible Maximum fluvial flood event under national guidance, which would typically comprise a 1% (1 in 100) AEP event with the Upper (+53%) climate change allowance. While the precise relationship between event rarity and flow magnitude varies between catchments, the Applicant's adopted design scenario is considered inherently conservative when compared with the approach typically used to define the design flood level.<br>In addition, the Applicant assessed both operational and pump failure scenarios and adopted the scenario that generated the highest flood levels across the site. This provides further confidence that the assessment captures a suitably conservative representation of flood risk conditions.<br>From a tidal flood risk perspective, the Applicant has discussed the implications of a Credible Maximum (H++) tidal scenario within the Flood Risk Assessment and Annex E of the Flood Risk Assessment (examination library reference REP1-052). The Applicant has demonstrated that the site would not be inundated under the tidal H++ scenario and that the River Welland breach scenario remains the conservative worst-case flood scenario for the proposed development.<br>Overall, while the Applicant has not presented a separate assessment of the 0.1% (1 in 1000) AEP event with the Upper climate change allowance applied, the available evidence indicates that this omission is unlikely to materially alter the conclusions of the Flood Risk Assessment. The adoption of a conservative design event scenario, the limited sensitivity of modelled flood levels to increased flows, consideration of pump failure scenarios, and |

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| | | demonstration of resilience during breach events collectively provide confidence that the development has been assessed against an appropriately robust range of future flood risk conditions. |
| Q19.0.8 | The applicant<br>Environment Agency | **Review of Hydraulic Modelling Files**<br>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.<br><br>**Environment Agency update:**<br>We raised two comments on the River Welland breach modelling regarding the adopted breach widths and the extent of the modelled area. The Applicant has now provided additional clarification on both points, and we consider the River Welland breach modelling to be suitable for the purposes of assessing flood risk and residual flood risk to the development.<br>Regarding the modelling undertaken for the Postland Catchment and South Holland Main Drain, we raised several comments for the Applicant to address. The Applicant has now addressed all our comments relating to the South Holland Main Drain modelling. A summary of the key points raised in relation to this model is provided below. For the Postland Catchment, whilst the model construct itself is considered reasonable, we requested that the Applicant simulate a more frequent flood event with the pumps operational to provide a better understanding of the implications for flood risk elsewhere.<br>For the Postland Catchment model, in addition to the 0.1% (1 in 1000) annual exceedance probability (AEP) plus Higher Central (+28%) climate change scenario with the pumps switched off, the Applicant has now simulated the 1% (1 in 100) AEP plus Higher Central (+28%) climate change scenario with the pumps switched on. This assessment identified some minor off-site increases in flood depth of approximately 0.03 m (3 cm). We have asked the Applicant to consider whether these increases are genuine or the result of numerical precision limitations and model instability. We have also requested that the Applicant consider whether any further mitigation can be implemented to remove these changes and demonstrate that there is no increase in flood depths off site. We await further analysis and assessment from the Applicant to address this matter.<br>In relation to the South Holland Main Drain, we raised several comments regarding the derivation and application of model inflows, representation of the floodplain, and the assessment of flood risk elsewhere. We requested further assessment of flood flows within the Gotts Catchment and the potential for the development to alter flood flow routes and result in off-site impacts.<br>To address these comments, the Applicant has developed a 2D hydraulic model of the Gotts Catchment, allowing for a more detailed representation of floodplain flow pathways and conveyance processes. The Applicant has compared the results from the updated 2D modelling with those from their original 1D hydraulic model. This comparison indicates that peak water levels predicted by the 2D model are lower than those predicted by the 1D model, providing confidence that the original 1D hydraulic model is both appropriate and conservative for the purposes of establishing design flood levels.<br>In terms of impacts on flood risk elsewhere, the Applicant has primarily relied on volumetric calculations to demonstrate that the proposed development would have a negligible effect on flood risk elsewhere. This approach assumes that any potential impacts are principally related to floodplain storage rather than flood conveyance. The updated 2D hydraulic modelling undertaken for the Gotts Catchment provides further evidence that the floodplain functions as a low energy environment, where flood storage processes are likely to be more important than conveyance.<br>The Applicant has also undertaken sensitivity testing of Manning's roughness values across the floodplain which helps to demonstrate the effects of increased flow impedance on water levels and flood extent. This sensitivity test shows negligible changes in flood depths (typically around 0.001 m) and extent. These findings provide additional confidence that the assessment methodology adopted by the Applicant is appropriate and that impacts on flood risk elsewhere associated with the South Holland Main Drain are likely to be negligible. |
| Q19.0.9 | The applicant | **Updates to the Flood Risk Assessment in response to amendments to the scheme and inclusion of stockpiling**<br>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:<br>• That the Flood Risk Assessment (FRA) [REP1-050] remains up to date considering this amendment and any other relevant changes.<br>• If stockpiles have been accounted for in the assessment of flood risk and, if not, why not. |
| Q19.0.10 | The applicant | **Flood risk modelling** |

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| | | 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 is requested to provide detail on how a scenario where multiple catchments flood at the same time has been considered. |
| Q19.0.11 | The applicant | **Necessity of development in Flood Zone 3b**<br>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. |
| Q19.0.12 | South Holland Internal Drainage Board | **Crossings**<br>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:<br>• In its opinion, whether the assessment now represents a 'reasonable worst-case'.<br>• Whether sufficient mitigation is secured through the OCEMP [REP1-061].<br>• 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.<br>• 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?<br>• 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.<br>• 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**<br>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.<br><br>**Environment Agency response:** EA31 – We are satisfied that REP1-021 Paragraph 11.7.16 ES Chapter 11: Hydrology and Flood Risk has been updated to provide a time frame for the temporary nature of the access crossing works - i.e. up to a maximum of 4 years. |
| Q19.0.14 | The applicant<br>Environment Agency | **Culvert design**<br>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?<br><br>**Environment Agency response:** We are satisfied that this general approach will address our concerns regarding potential impacts on fish, subject to confirmation of revised wording in the oCEMP to secure that any culverts 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. We await revised oCEMP to be able to resolve this issue. |
| Q19.0.15 | South Holland Internal Drainage Board | **Access to watercourses** |

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| | | 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<br>North Level District Internal Drainage Board | **Provision for the North Level District Internal Drainage Board**<br>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? |
| Q19.0.17 | Lincolnshire County Council (as the Lead Local Flood Authority)<br>Environment Agency | **7.1 Outline Flood Emergency Response Plan**<br>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:<br>• 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.<br>**Environment Agency response:** In relation to the requirements of NPS EN-1, the Outline Flood Emergency Response Plan (OFERP) provides additional information on how site users, during both construction and operational phases, would be kept safe from flood hazards. In particular, the document identifies access and egress routes, evacuation procedures and safe refuge locations. The OFERP also identifies the Environment Agency's Flood Warning Service and other available warning mechanisms and explains how these would be incorporated into the site-specific flood emergency procedures.<br>We are broadly satisfied that the OFERP provides further information relevant to the requirement of NPS EN-1, paragraphs 5.8.11, 5.8.29, 5.8.33 and 5.8.36, particularly in demonstrating how flood risk would be managed and how site users would be informed of, and should respond to, flood events through warning, evacuation and refuge procedures. However, in relation to paragraph 5.8.15 of NPS EN-1, we consider that further information is required. While the OFERP identifies access and escape routes and provides indicative evacuation times, where this data is available, it does not adequately assess the vulnerability of those using the site in relation to safe access and escape during flood events. In particular, the plan does not assess hazard posed by flood conditions on evacuation routes, taking account of flood depth, velocity, rate of onset and duration of flooding.<br>We strongly recommend that the applicant refers to FD2320/FD2321 Flood Risks to People guidance including the flood hazard rating methodology and associated hazard classification tables, to assess the suitability of proposed access and egress routes for different site users. Such an assessment should consider whether routes would remain safe for all users, including potentially more vulnerable individuals. This would provide greater confidence that safe access and escape can be achieved.<br>• 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.<br>**Environment Agency response:** We accept the flood depths and speed-of-onset information presented within Table 2-1: Summary of Flood Risk to the Scheme provided and consider the values to be appropriate for the purposes of informing the OFERP.<br>In relation to the South Holland Main Drain catchment, the applicant has recently constructed a 2D model for the Gotts catchment, from which it should be possible to determine the speed of onset of flooding. Within a technical note dated 15th October 2026 titled 'South Holland Main Drain Modelling – Response to EA Comments' a localised 2D spreading model for the Gotts Catchment is described. We would recommend the Applicant revisit the OFERP considering this new modelling and include information on the speed of onset data.<br>The approach proposed within the OFERP appears reasonable in the context of the available evidence. However, it is for the Local Authority to determine whether the proposed warning, evacuation and site management measures are sufficient and appropriate for the development.<br>• Is the use of 'average flood depth' in m Above Ordnance Datum (AOD) an appropriate way to describe a reasonable worst-case depth?<br>**Environment Agency response:** It is noted that Table 2-1 (Summary of Flood Risks to the Scheme presents flood risk information using an 'estimated average flood depth'. In general, we would not rely on average flood depths when assessing flood risk, emergency planning requirements or the adequacy of mitigation measures. Instead, assessments should be based on the relevant design flood event and a reasonable worst-case scenario, as these provide a more appropriate basis for understanding potential flood hazards and informing emergency response measures. |

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| | | However, in this instance, Table 2-1 appears to be included for the purpose of providing a high-level summary of the flood risks affecting the Scheme and contextual information for the OFERP. The average flood depths presented in the table are not subsequently relied upon to determine key elements of the emergency response strategy, including warning triggers, evacuation procedures, mitigation measures, resilience measures or other flood management actions.<br><br>• 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?<br>**Environment Agency response:** We do not consider the risk of fluvial flooding arising from a breach of the River Welland flood defences during the construction period to be negligible. While the probability of such an event occurring is considered to be low, a residual risk remains and should be recognised.<br>The River Welland flood defences provide a high standard of protection and are maintained to the required standard, which reduces the likelihood of a breach occurring. On this basis, it is reasonable to conclude that a breach event is unlikely.<br>We are satisfied that the OFERP appropriately recognises this residual risk and considers the associated emergency response requirements. In particular, the plan includes consideration of the speed of onset associated with a breach scenario and adopts a reasonable worst-case approach to informing emergency procedures.<br><br>• 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?<br>**Environment Agency response:** We are content that the risk from tidal flooding is appropriate represented within the flood extents derived from the River Welland 1 in 1,000 annual probability breach model, including a 28% climate change allowance.<br>The River Welland is a tidally influenced system and the breach modelling has been undertaken using an extreme scenario, including an allowance for the effects of climate change.<br><br>• Are you satisfied that the evacuation points shown in appendix A are sufficient and accessible in the time available?<br>**Environment Agency response:** Based on the information provided, we are unable to confirm that all proposed evacuation routes and evacuation points would remain safe and accessible under flood conditions. In accordance with the principles set out in FD2320/FD2321 Flood Risks to People, the suitability of evacuation routes and refuge locations should be informed by an assessment of flood hazard, taking account of flood depth, velocity and, where relevant, other factors influencing risk to people. Where flood depth and velocity data are available, the associated hazard ratings should be used to determine whether the proposed evacuation routes and destinations would remain safe for those required to use them.<br>Notwithstanding the above, the OFERP incorporates a precautionary approach through the monitoring of EA flood warnings and weather forecasts, with evacuation actions intended to be implemented before flood conditions arise. The adequacy of the overall evacuation strategy, including the suitability and accessibility of the proposed evacuation points and the arrangements for emergency planning and response, is for the Local Authority to consider.<br><br>• 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?<br>**Environment Agency response:** In relation to paragraph 3.1.10, we consider it as the Local Authority's responsibility to consider whether the proposed arrangement is workable and sufficient.<br>However, we would expect this process to be informed by any advice accompanying Flood Alerts and Flood Warnings issued for the area. Such warnings may provide important information on the timing and severity of flood risk and should be considered when implementing the actions set out within the OFERP.<br><br>• 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 |

| ExQ1 | Question to: | Question: |
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| | | 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?<br>**Environment Agency response:** From a flood risk perspective, restricting site activities during periods of heightened flood risk seems a sensible measure. However, the adequacy of the proposed procedures falls outside of the EA's remit. We would defer to the Local Authority on this matter.<br><br>• 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?<br>**Environment Agency response:** The 1% AEP plus climate change events represent credible flood scenarios and provide an appropriate basis for understanding the nature of the flood hazard, the potential impacts on access and egress routes, and the actions required to ensure site users are kept safe from flooding. However, as noted previously, further consideration of flood hazard to people, including the use of the FD2321 methodology where suitable depth and velocity data are available, would provide additional confidence regarding the safety of access and egress routes.<br><br>• 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?<br>**Environment Agency response:** It is understood that the proposed flood walls and gates are Parcels A, B and C are intended as part of the wider flood risk management strategy for the development and are not solely included to protect the designated refuge areas. These measures were considered as part of the Flood Risk Assessment and form part of the resilience measures incorporated into the Scheme.<br>In principle, we have no concerns with the use of flood walls and gates to provide flood resilience to the development, including the protection of refuge areas, provided they are operated and maintained appropriately.<br>The continued effectiveness of these structures over the proposed 40-year operational lifetime of the development will be dependent upon ongoing inspection, maintenance, repair and, where necessary, replacement. Responsibility for ensuring that these measures remain functional and continue to provide the intended standard of protection throughout the lifetime of the development rests with the developer and any subsequent site operator.<br><br>• 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?<br>**Environment Agency response:** From a flood risk perspective, we have no specific comments on the proposed duration of emergency supplies. It should be for the Local Authority to confirm whether this arrangement is appropriate. |
| Q19.0.18 | Lincolnshire County Council (as the Lead Local Flood Authority)<br>Environment Agency | **Safety of workers in construction compounds**<br>The OCEMP [REP1-061] states that 'Where reasonably practicable, temporary construction compounds will be located outside of areas of fluvial Flood Zones 2 and 3'. Construction compounds may contain welfare facilities and refuge from flooding. The applicant states that it is anticipated that some compounds may need to be located in Flood Zones 2 and 3, associated with a breach scenario for the River Welland, and Flood Zone 3b of the South Holland Main Drain Gotts catchment (the inundation time of which is unknown) [REP2-005]. In section 3.1.3 [REP2-005] the applicant suggests that 7 'illustrative' locations would be at risk from a breach of the River Welland flood defences (coinciding with the undefended Flood Zone 2 of the Postland Catchment), two locations in the undefended Gotts catchment, including in the 1 in 30 year % AEP event would be at risk, and two locations associated with the GCR where there is no detailed modelling. In these examples, the applicant proposes that safe refuge is provided in a welfare cabin, either raised on a platform or stacked on top of the ground floor unit.<br>• 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?<br>**Environment Agency response:** The OFERP does not include an assessment of the flood hazards associated with access and egress routes, including the anticipated depth, velocity and hazard rating of floodwaters. Such information would assist in demonstrating that site users would not be exposed to hazardous flooding conditions before reaching a place of safety. For locations affected by breach scenarios from the River Welland and the Postland Catchment, the available speed of inundation suggests a relatively short warning period. In addition, the speed of onset of flooding associated with the South Holland Main Drain is not available. Whilst the proposed refuge arrangements may reduce risks to site users, it is not possible to conclude from the information provided that all evacuation and refuge routes would remain free from hazardous flood conditions. |

| ExQ1 | Question to: | Question: |
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| | | However, assessing the acceptability of flood emergency response measures is a matter for the Local Authority.<br>Separately, there remains a policy consideration regarding the proposed siting of temporary construction compounds within Flood Zone 3b, irrespective of the adequacy of flood emergency measures.<br><br>• 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?<br>**Environment Agency position:** It cannot be conclusively demonstrated from the information provided that no construction works would be exposed to hazardous flood conditions along evacuation routes. Whether the proposed management and emergency planning measures are sufficient is a matter for the Local Authority.<br><br>• 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?<br>**Environment Agency response:** The extent to which this approach can be relied upon as mitigation needs to be considered by the Local Authority. |
| Q19.0.19 | The applicant | **Outline Flood Emergency Response Plan**<br>Please confirm the following in relation to the OFERP [REP2-005]:<br>• 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.<br>• 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.<br>• 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.<br>• 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?<br>• 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?<br>• 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.<br>• 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?<br>• 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.<br>• 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. |

| ExQ1 | Question to: | Question: |
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| | | • 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?<br>• 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. |
| Q19.0.20 | The applicant | **Location of compounds during operation**<br>• 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.<br>• 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.<br>• 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?<br>• 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. |
| Q19.0.21 | The applicant | **Historical information on previous flood events**<br>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. |
| Q19.0.22 | Lincolnshire County Council<br>South Holland Internal Drainage Board<br>North Levels Internal Drainage Board<br>Environment Agency | **Adoption and maintenance of the drainage system**<br>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?<br><br>**Environment Agency response:** We are satisfied the relevant maintenance is sufficient. As named consultees in Requirements 12 Construction environmental management plan, 13 Operational environmental management plan and 21 Decommissioning and restoration we are satisfied any further detail can be approved post consent. |
| Q19.0.22 | The applicant | **Subsurface drainage pathways**<br>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.<br>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. |
| **20. Other environmental topics** | | |
| Q20.0.1 | The applicant | **Electric and magnetic fields**<br>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.<br>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. |

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| | | 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. |
| Q20.0.2 | The applicant | **Glint and glare**<br>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]).<br>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? |
| Q20.0.3 | The applicant | **Glint and glare**<br>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:<br>• 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.<br>• 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. |
| Q20.0.4 | The applicant | **Glint and glare**<br>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 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.<br>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. |
| Q20.0.5 | The applicant | **Materials and waste**<br>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?<br>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? |
| Q20.0.6 | Lincolnshire County Council | **Materials and waste**<br>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.<br>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**<br>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 |

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| | | 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. |
| Q20.0.8 | The applicant<br>Peterborough and Spalding Gliding Club Ltd | **Peterborough and Spalding Gliding Club**<br>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.<br>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:<br>• What "remaining interactions" between the proposed development and the Gliding Club require the provision of a "side agreement".<br>• The principal provisions of the proposed side agreement and how these are intended to address or mitigate the remaining interactions identified.<br>• Whether any risks, impacts or operational constraints could arise if the side agreement is not finalised or entered into by the parties.<br>• How the side agreement would be administered.<br>• The current status of the legal review and an indication of the anticipated timescale for concluding the agreement. |
| Q20.0.9 | The applicant | **Fenland Aero Club**<br>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.<br>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. |
| Q20.0.10 | The applicant | **Major accidents and disasters**<br>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 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. |
| Q20.0.11 | The applicant | **Major accidents and disasters**<br>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:<br>• 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.<br>• 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. |
| Q20.0.12 | Lincolnshire Fire and Rescue Service | **Major accidents and disasters**<br>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<br>Lincolnshire Fire and Rescue Service | **Major accidents and disasters**<br>The LCC LIR [REP1-106] indicates that a financial contribution to Lincolnshire Fire and Rescue Service (LFRS), secured through a protective provision, is sought to fund a programme of monitoring, inspection and risk assessment to ensure ongoing compliance with the OBSMP and the Emergency Response Plan. The applicant's Comments on Local Impact Reports document [REP2-015] confirms that the applicant agrees to the proposed protective provisions.<br><br>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? |

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| | | 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.<br>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? |
| Q20.0.14 | The applicant | **Major accidents and disasters**<br>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:<br>• Confirm whether fire risk assessments have been undertaken for the solar PV arrays and all other non-BESS elements of the proposed development.<br>• 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.<br>• 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.<br>• 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. |

**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:<br>• 1110 Sandbanks which are slightly covered by sea water all the time<br>• 1140 Mudflats and sandflats not covered by seawater at low tide<br>• 1160 Large shallow inlets and bays<br>• 1170 Reefs<br>• 1310 Salicornia and other annuals colonizing mud and sand<br>• 1330 Atlantic salt meadows<br>• 1420 Mediterranean and thermos-Atlantic halophilous scrubs<br>• Coastal lagoons<br>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<br>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<br>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) | - | - | - | ?? | **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<br>Ramsar Criterion 3: Inter-relationship between its various components including saltmarshes, intertidal sand and mud flats and the estuarine waters<br>Ramsar Criterion 5: Waterfowl assemblages of international importance (See Q11.0.2, Q11.0.3)<br>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<br>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 | 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) | - | - | - | ?? | **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<br>Potential Ramsar criterion 6: winter - golden plover, lapwing<br>(See Q11.0.4) | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? |
| **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) | - | - | - | - | - | - |
| | Water pollution (See Q11.0.7) | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? |
| **Nene Washes SPA** | | | | | | | | | | | | | |
| Article 4.1 Qualification: Non breeding Bewick's swan | 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 |
| Article 4.2 Qualification: Breeding shoveler, garganey, gadwall, black tailed godwit, pintail, teal and wigeon (See Q11.0.1) | 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 | ?? | ?? | ?? | - | - | - | ?? | ?? | ?? |
| | Direct loss of functionally linked land (See Q11.0.15) | No LSE | - | No LSE | ?? | ?? | ?? | - | - | - | ?? | ?? | ?? |
| | Predator Shadow (See Q11.0.15) | - | - | - | ?? | ?? | ?? | - | - | - | ?? | ?? | ?? |
| | 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) | 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) | - | - | - | ?? | **LSE (NE8)** | ?? | - | - | - | ?? | **AEoI (NE18)** | ?? |
| | Collision risk | - | LSE | - | - | LSE (NE10) | - | - | No AEoI | | - | No AEoI (NE15) | |
| Potential Ramsar criterion 6: wintering pintail<br>Potential Ramsar criterion 6: spring / autumn black tailed godwit<br>(See Q11.0.4) | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? |
| Ramsar criterion 2 (See Q11.0.3) | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? | ?? |