



# OAKLANDS FARM SOLAR PARK

Applicant: Oaklands Farm Solar Ltd

The Applicant's Response to the Second Written Questions

October 2024

Document Ref: EN010122/D4/12.3

Version: Deadline 4

# 1 INTRODUCTION

## 1.1 PURPOSE OF THIS DOCUMENT

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- 1.1.1 This Document has been prepared for submission at Deadline 4 of the Examination by the Planning Inspectorate into an application by Oaklands Farm Solar Limited ("the Applicant") (a wholly owned subsidiary of BayWa r.e UK Ltd - "BayWa") under the Planning Act 2008 for a Development Consent Order (a "DCO") for the construction, operation, maintenance and decommissioning of ground mounted solar photovoltaic arrays and a Battery Energy Storage System ("BESS") on land west of the village of Rosliston and east of Walton-on-Trent in South Derbyshire ("the Proposed Development").
- 1.1.1 This Document provides the response at Deadline 4 by the Applicant to the Second Written Questions set by the Examining Authority.
- 1.1.2 This document has been prepared as part of the DCO application ("the Application") and should be read in conjunction with the other documents submitted within the Application and by the Applicant at Deadline 4.



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Ref:	Question to:	Question:	Applicant's Response at D4
1. Draft Development Consent Order (dDCO) and other consents			
		<p>Reference is made to the version of the dDCO submitted by the Applicant at Deadline 3 <a href="#">[REP3-008]</a>.</p> <p>References to “recent DCO precedent” are to the made DCO and Decision Letters for one or more of <a href="#">Sunnica Energy Farm</a>, <a href="#">Mallard Pass Solar Project</a>, or <a href="#">Gate Burton Energy Park</a>.</p> <p>Other questions on dDCO matters are included under later headings, for example in relation to the land rights powers requested by the Applicant and in relation to securing mitigation measures.</p>	
<b>General points</b>			
1.1	Applicant	<p><u>Consistency with recent DCO precedent</u></p> <p>Please could the Applicant carry out a general review of the dDCO against recent DCO precedent and either make any changes necessary to ensure consistency or justify any differences? This should include consideration of changes for clarity and the need to conform with current practice for statutory instruments that do not materially alter its effect.</p>	<p>The Applicant's Explanatory Memorandum identifies articles and paragraphs within the DCO that are precedented, together with any divergences from precedent drafting, and justifies the need and purpose for each article and paragraph.</p> <p>Having undertaken a comparison exercise between the dDCO [REP3-003] and recent DCO precedent, the Applicant has updated some definitions in Article 2 (interpretation) of the dDCO and other minor amendments as set out in the Table of Amendments to the dDCO [Doc 3.1] submitted at Deadline 4 to align with recent DCO precedent where the drafting is the same across the recent DCO precedents and such amendments do not materially alter its effect.</p> <p>As regards the Requirements and Schedules to the dDCO, save for as outlined in these ExQ2 responses and in the Table of Amendments to the dDCO, or where the amendments are for consistency, the Applicant does not propose to amend the substantive drafting of these parts of the dDCO as where there are differences in content between the dDCO and recent DCO precedent, these are justified through the need to tailor each DCO to the authorised development to which it relates.</p> <p>No further action is proposed.</p>
1.2	Applicant	<p><u>Consistency with recent guidance</u></p> <p>Please could the Applicant carry out a general review of the dDCO against the <a href="#">Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects</a> guidance published on 30 April 2024 and either make any changes that are needed to comply with that guidance or justify any differences?</p>	<p>The Applicant has reviewed the dDCO against <i>Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects</i> guidance published on 30 April 2024 and considers it is compliant with the same as follows:</p> <ul style="list-style-type: none"> <li>(a) <b>Characteristics of a DCO:</b> the dDCO contains all the characteristics of a DCO (Paragraph 003 Reference ID 04-003-20240430), which are relevant to the authorised development.</li> <li>(b) <b>Definitions:</b> the definitions used within the dDCO are consistent with recent DCO precedent and to ensure it is “precise in its meanings” the definitions, where appropriate, are bespoke from those at Section 235 of the Planning Act 2008 (Paragraph 04 Reference ID 04-004-20240430).</li> <li>(c) <b>Defining commencement:</b> the definition of “commence” within the dDCO allows for site preparation works (except where stated to the contrary) to be undertaken and not be considered as a material operation which begins the development in accordance with section 155 of the Planning Act 2008.</li> </ul> <p>The Applicant considers the site preparation works carved out of the definition for “commence” are not “so extensive that they would be likely to have significant environmental effects themselves”. The dDCO does include</p>

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			<p>site clearance within the definition of “site preparation works” but these works are subject to appropriate controls, for example at Requirement 9(5) (construction environmental management plans) where the site preparation works included within the definition of “commence” for the purposes of that section, are limited to site preparation works comprising site clearance and no site preparation works are to be commenced until a soil management plan covering the site preparation works is submitted to and approved by the local planning authority.</p> <p>Requirement 10(5) (construction traffic management plan) and Requirement 18(5) (archaeology) also provide that where the site preparation works included within the definition of “commence” for the purposes comprise site clearance. See also the Applicant’s response to ExQ 1.5 below.</p> <p>Requirement 13 (land contamination) also ensures that no part of the site preparation works for a phase comprising remedial work in respect of any contamination may commence until a contamination risk assessment has been submitted and approved by the local planning authority in consultation with the Environment Agency.</p> <p>The Applicant therefore considers that the definition of “commence” is compliant with Paragraph 005 Reference ID 04-005-20240430 of the guidance.</p> <p>(d) <b>Defining maintenance:</b> the definition of “maintenance” within the dDCO does not permit the replacement of the authorised development with the construction of what is effectively a different project and ensures that any actions taken within the scope of the definition to maintain the authorised development will not “result in adverse significant environmental effects not already identified or assessed as part of the Environmental Statement”. The dDCO is therefore compliant with Paragraph 006 Reference ID 04-006-20240430 of the guidance.</p> <p>(e) <b>Description of development:</b> the dDCO accurately defines the Order land and the areas where works are to be undertaken by reference to the works plans, land plans and design parameters. The definition of “associated development” within the dDCO complies with the guidance <i>Planning Act 2008: associated development applications for major infrastructure projects</i> and has been “demonstrably linked” and is subordinate to the authorised development, as set out in Part 1 (authorised development) of Schedule 1 of the dDCO. Paragraph 007 Reference ID 04-007-20240430 of the guidance is therefore complied with.</p> <p>(f) <b>Parameters and limits of deviation:</b> the Applicant notes that Paragraph 008 Reference ID 04-008-20240430 states that “the DCO will usually provide for the precise location of numbered works to be subject to horizontal and/or vertical limits of deviation”. This detail has not been provided in the dDCO as the authorised development is limited to the design parameters as set out in Table 4.2 of the Environmental Statement, the works plans and the definitions of “Order land” and “Order limits”. The Applicant notes the content of this paragraph in the guidance is not mandatory and having considered the guidance that the design parameters in the dDCO “must be no more than necessary to accurately contain the</p>

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			<p>proposed development”, the Applicant considers the dDCO to comply with the same, such that no further action is proposed to describe the extent of the authorised development than what is currently provided for.</p> <p>(g) <b>Application, modification or exclusion of statutory provisions and inclusion of other consent requirements in a DCO:</b> article 6 (disapplication and modification of legislative provisions) of the dDCO sets out the legislation to be modified or disapplied to remove the need to obtain certain additional authorisations as set out in Schedule 2 of the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 for the authorised development to be undertaken.</p> <p>Article 21 (application of the 1981 Act) and Article 24 (modification of Part 1 of the Compulsory Purchase Act 1965) clarify the necessary amendments to those statutory provisions so that they apply to the authorised development.</p> <p>The more significant modification to legislation, that is the modification of compensation and compulsory purchase enactments for the creation of new rights and imposition of new restrictive covenants, is amplified in detail in Schedule 7.</p> <p>The Applicant therefore considers the dDCO to comply with Paragraph 009 Reference ID 04-009-20240430.</p> <p>(h) <b>Compulsory acquisition and temporary possession:</b> Part 5 (powers of acquisition) of the dDCO sets out the powers sought by the Applicant to compulsory acquire and temporary possess land, rights or restrictive covenants in relation to the authorised development. Article 18 (time limit for exercise of authority to acquire land compulsorily) requires the Applicant to compulsorily acquire land within five years, in accordance with the legislative provisions and guidance. The Explanatory Memorandum and Statement of Reasons set out the case for the inclusion of these powers within the dDCO. The Applicant therefore considers the dDCO to be compliant with Paragraph 011 Reference ID 04-011-20240430.</p> <p>(i) <b>Protective provisions:</b> please see the Applicant's response to ExQ 1.21 below. The Applicant considers the dDCO to comply with Paragraph 012 Reference ID 04-012-20240430 of the guidance.</p> <p>(j) <b>Deemed marine licences:</b> Paragraph 013 Reference ID 04-013-20240430 of the guidance is not applicable to the scheme such that no further justification for the exclusion of a deemed marine licence with the dDCO is considered necessary.</p> <p>(k) <b>Appeals mechanism:</b> As set out in Paragraph 014 Reference ID 04-014-20240430, there are two options for applicants in providing an appeal mechanism in a DCO. The Applicant has elected, in an approach consistent with recent DCO precedent, to include a bespoke appeals mechanism at article 39 (requirements, appeals, etc.) and Part 3 (procedure for discharge of requirements) of Schedule 1 of the dDCO. The Applicant therefore considers it has complied with the guidance in this regard.</p>

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			<p>(l) <b>Hedgerows and trees:</b> Paragraph 015 Reference ID 04-015-20240430 enables applications “to include an article within the draft DCO to allow the removal hedgerows (if necessary) for the purposes of carrying out the authorised development without the need to first secure consent under the Hedgerows Regulations 1997.” The Applicant has included this provision at article 37 (felling or lopping of trees or removal of hedgerows) of the dDCO, and the case for this inclusion is presented in the Explanatory Memorandum. The Applicant has also included at article 38 (trees subject to tree preservation orders) and refers the Examining Authority to its response to ExQ 7.3 below. The Applicant considers the dDCO to be consistent with this part of the guidance.</p> <p>(m) <b>Certification of plans and documents:</b> in accordance with Paragraph 016 Reference ID 04-016-20240430, the Applicant has provided an article (35 – certification of plans, etc.) and a Schedule (12 – documents to be certified) in the DCO, which by the close of Examination will set out the documents to be certified as true copies by the Secretary of State following approval of the DCO. The Applicant considers the dDCO to comply with this paragraph and no further changes are proposed.</p> <p>(n) <b>Requirements:</b> Paragraph 017 Reference ID 0-017-20240430 of the guidance sets out that requirements may be imposed where they are precise, enforceable, necessary, relevant to the development, relevant to planning and reasonable in all other circumstances. The Applicant considers the Requirements at Part 2 (requirements) of Schedule 1 to comply with this guidance. The Applicant has also set out the body responsible for discharging each Requirement together with the time at which each Requirement becomes effective. The Requirements seek to secure a range of matters in the delivery of the authorised development from detailed design approval (Requirement 5), mitigation measures through management plans and decommissioning (Requirement 22). The Applicant therefore considers the dDCO to be consistent with this part of the guidance and proposes no further changes.</p> <p>(o) <b>DCO revisions:</b> throughout the Examination the Applicant has provided the Examining Authority with clean and tracked versions of the dDCO to provide a clear audit trail of the amendments made to the dDCO, together with the Table of Amendments, which justifies why changes have been made. In accordance with the guidance and Examination timetable, the Applicant will provide a validated word version of the final DCO before the close of Examination. The Applicant therefore considers the dDCO conforms with Paragraph 18 Reference ID 04-018-20240430 of the guidance.</p> <p>(p) <b>The Explanatory Memorandum:</b> as required by Paragraph 019 Reference ID 04-019-20240430, the Applicant’s Explanatory Memorandum explains why each article and requirement within the dDCO is necessary for the authorised development. The Applicant has provided clean and tracked versions of the Explanatory Memorandum where amendments have been made to it during the course of Examination and will continue to do so until the Examination closes. The Applicant therefore considers the Explanatory Memorandum to be consistent with the guidance and no further changes are proposed.</p>

Ref:	Question to:	Question:	Applicant's Response at D4
1.3	Applicant	<p><u>Materially new or materially different effects</u></p> <p>The Applicant [REP1-025 response to question 1.1] refers to replacing the phrase “materially new or materially different environmental effects from those assessed in the environmental statement” with “any materially new or materially more adverse environmental effects compared to those identified in the environmental statement” in the dDCO [REP3-008].</p> <p>The changes have not been made to the dDCO [REP3-008].</p> <p>Please could the Applicant comment?</p>	<p>The Applicant apologises for this error and has corrected the drafting in the dDCO submitted at Deadline 4 to align with its response to ExQ 1.1 in REP1-025.</p>
1.4	<p>Applicant</p> <p>Derbyshire County Council (DCC)</p> <p>South Derbyshire District Council (SDDC)</p> <p>Environment Agency (EA)</p>	<p><u>Articles 11(7), 14(9), 16(6) - Guillotine</u></p> <p>Articles 11(7), 14(9), 16(6) confer deemed consent if the authority does not respond within 28 days (a “guillotine”).</p> <p>DCC [REP1-026] and SDDC [REP1-029] consider that 28 days is a tight timeframe to deal with a submission, particularly if consultation is required between authorities, with internal consultees, or the Applicant. They ask that provision is made for the authority’s attention to be drawn to the guillotine.</p> <p>The EA [REP1-032] does not support “deemed approval” for any consents, but ask that provision is made for attention to be drawn to the guillotine if the approach is taken.</p> <p>The Applicant [REP1-025, REP3-032] does not consider it necessary for any application for consent to contain a statement drawing the authority’s attention to the deemed consent period as it considers that this is clearly and properly provided for within the dDCO [REP3-008] and DCC, SDDC and the EA have been made aware of the “deemed consent” provisions through this examination process. The Applicant has revised Articles 11(7), 14(9) and 16(6) to allow the 28-day period to be extended if agreed in writing between the parties. It does not propose any further amendments.</p> <p>With reference to the Applicant’s updates, the ExA notes that if an extension to the 28-day period is not agreed in writing then the “deemed approval” provisions would remain. The ExA notes the likely benefits for applications for consent to be properly considered, and for the timescales to be reasonable. It would like to find the right balance between not unnecessarily delaying the Proposed Development and ensuring that appropriate regard is given to the interests and advice of parties involved in considering applications for consent. The ExA refers to the form of words adopted in Articles 14(7), 18(12), 19(10), 21(7) of <a href="#">The A57 Link Roads Development Consent Order 2022</a>.</p> <p>a) Do DCC, SDDC, and the EA still ask that provision is made for the authority’s attention to be drawn to the guillotine?</p> <p>b) Please could the Applicant comment?</p>	<p>(a) No response required.</p> <p>(b) The Applicant maintains its position that attention to the deemed approval provisions has been properly and proportionately brought to the attention of DCC, SDDC and the EA through the Examination procedure and proposes no further revisions at this time. In a meeting on 9 September 2024, the local planning authorities agreed that the Applicant’s revision [REP3-008] to allow the 28-day period to be extended with the written agreement of the parties alleviates their concerns and have informed the Applicant they will confirm this position in their Deadline 4 submissions. No further action is therefore proposed.</p>
<b>Part 1 - Preliminary</b>			
1.5	<p>Applicant</p> <p>DCC</p> <p>SDDC</p> <p>EA</p>	<p>Article 2 – Interpretation</p> <p>DCC [REP1-026] and SDDC [REP1-029] consider that some site preparation works have the potential to create adverse noise and air quality impacts including “remedial work in respect of any contamination or other adverse ground conditions” and “site clearance (including vegetation removal, demolition of existing buildings and structures)”. They say</p>	<p>(a) The Applicant notes DCC [REP1-026] and SDDC’s [REP1-029] concerns and has revised Requirement 10 (construction traffic management plan) to include site preparation works comprising of site clearance works in the definition of “commence” for these Requirements to the effect that the CTMP must be submitted to and approved by the local planning authority prior to the commencement of site preparation works for a phase that could give rise to construction traffic. The Applicant has also revised Requirement 18(1)</p>



Ref:	Question to:	Question:	Applicant's Response at D4
	Natural England (NE)	<p>that "commencement" should include site preparation works relating to protected species, archaeological remains and traffic.</p> <p>In relation to "site clearance (including vegetation removal, demolition of existing buildings and structures)", the Applicant [REP3-032] has amended Requirement 9 - Construction environmental management plans (CEMP) to provide that for the purposes of Requirement 9, "commence" includes site clearance works.</p> <p>EA [REP1-032] consider that significant environmental effects from "remedial work in respect of any contamination or other adverse ground conditions" cannot be ruled out and advise that this is removed from "site preparations work", and that such works are undertaken with controls that apply at commencement, including Requirements 9 and 13.</p> <p>In relation to "remedial work in respect of any contamination or other adverse ground conditions", the Applicant [REP3-032] has amended Requirement 13 – Land contamination to provide that no remedial works in any phase of the development may commence until a contamination risk assessment has been produced.</p> <p>NE [REP1-037] say that if site preparation would involve the breaking the soil or other activity that could damage the soil through compaction etc. then further information about the potential impacts on Best Most Versatile (BMV) agricultural land should be included and suitable mitigation measures secured to ensure that this resource is not damaged. It says that additional mitigation measures must be proposed and secured to ensure that there is no impact on the designated sites features if any site preparation work in the River Mease Special Area of Conservation (SAC) and River Mease Site of Special Scientific Interest (SSSI) catchment has the potential to mobilise sediment.</p> <p>a) Please could the Applicant clarify how its updates would address the concerns raised by DCC and SDDC in relation to archaeological remains and traffic? Should updates also be made to Requirement 10 - Construction traffic management plan (CTMP) and Requirement 18 – Archaeology? Please could DCC and SDDC comment?</p> <p>b) Do DCC, SDDC, or EA have any remaining concerns in relation to the mitigation of site preparation works? How might they be resolved?</p> <p>c) Please could the Applicant comment on whether any updates are required to address NE's concerns, including in relation to the River Mease SAC and SSSI? If not, why not?</p> <p>d) Please could NE set out any remaining concerns in relation to site preparation works at Deadline 5 and suggest how they might be resolved?</p>	<p>(archaeology) to require the written scheme for the investigation of areas of archaeological interest to be submitted to and approved by the local planning authority prior to the commencement of any phase of the development, including any phase requiring archaeological works that could give rise to archaeological impacts.</p> <p>(b) No response required.</p> <p>(c) The Applicant considers Requirement 9 (construction environmental management plans) to secure the necessary mitigation measures relating to the River Mease SAC and SSSI in that the CEMP for each phase of the authorised development must include a soil management plan, site waste and materials management measures, pollution control measures to prevent the introduction of any hazardous substances, a water quality and silt management plan, a protocol requiring consultation with the Environment Agency in the event that unexpected contaminated land is identified during ground investigation or construction, an environmental monitoring plan and flood risk management measures including surface water management. Prior to the carrying out of site preparation works, a soil management plan in relation to such works must be submitted and approved.</p> <p>Further to the issue of ExQ2, Natural England (NE), as set out in the Applicant's response to ExQ 7.1 below, has agreed that "SuDS are not required and that the removal of annual inputs from intensive agriculture will provide an overall improvement in water quality" and that there is no adverse effect on the integrity of the River Mease SAC. The Applicant therefore considers that NE's previous position has been superseded and the Applicant's approach is appropriate.</p> <p>No further amendments are therefore considered necessary and no further action is proposed.</p> <p>(d) No response required.</p>
	<b>Part 2 - Principal Powers</b>		
1.6	Applicant	<p><u>Article 3 - Development consent etc. granted by the Order</u></p> <p>DCC [REP1-026] and SDDC [REP1-029] consider it reasonable for the works to be located in the numbered areas to ensure the expected adverse impacts are not exceeded.</p> <p>The Applicant [REP1-025, REP3-032] says that the effect of Article 3(2) is that the works are necessarily located within the numbered areas such that there would not be any materially new or materially more adverse environmental effects compared to those identified in the ES.</p> <p>The ExA notes that Article 3 makes no provision in relation to environmental effects.</p>	<p>(a) The Applicant has inserted a new sub-paragraph (3) to Article 3 to clarify that the Article does not authorise the carrying out of any works which are likely to give rise to materially new or materially more adverse environmental effects to those identified in the environmental statement. The Applicant has revised Article 2 (interpretation) of the dDCO to incorporate a new definition for "design parameters" and revised Requirement 5 (detailed design approval) accordingly.</p>

Ref:	Question to:	Question:	Applicant's Response at D4
		<p>a) For clarity, please could the Applicant reconsider whether Article 3 should include a provision for numbered works to be located within the corresponding numbered area shown on the works plan such that there would not be any materially new or materially more adverse environmental effects compared to those identified in the ES?</p> <p>The ExA notes the Requirement 5 provisions in relation to design parameters.</p> <p>b) For consistency, should Article 3 refer to design parameters in the same manner as Requirement 5? Should a definition of "design parameters" be provided in Article 2 and Requirement 5 simplified accordingly?</p>	
1.7	Applicant	<p><u>Article 5 – Consent to transfer benefit of Order</u></p> <p>a) With reference to recent DCO precedent, should Article 5(3)(b) be deleted?</p> <p>b) Should it be necessary for any transfer under Article 5(3)(c) to be to a company with a licence under Section 6 (licences authorising supplies etc.) of the 1989 Act? If not, why not?</p>	<p>(a) The Applicant does not consider it necessary to delete Article 5(3)(b) with reference to recent DCO precedent as it is disproportionate to require the Secretary of State's consent to transfer the benefit of the DCO to the Applicant's own holding company or a subsidiary of it. The Applicant's preference is to retain Article 5(3)(b) in order to retain flexibility within its company structure as to which entity is entitled to carry out parts of the authorised development. No further action is therefore proposed.</p> <p>(b) Neither recent DCO precedent, nor the additional precedent referred to in the Applicant's Explanatory Memorandum, limit transfers under the equivalent provisions to Article 5(3)(c) to companies with a licence under Section 6 of the 1989 Act. The purpose of this Article is to protect the provision of compensation for the compulsory acquisition of rights or interests in land. Article 5(3)(c) permits transfer or grant of the benefit of the Order without the need to obtain Secretary of State approval where there are no outstanding actual or potential compulsory purchase claims, such that compensation protection is no longer required. Article 5(4) to (7) requires the Secretary of State to be given advance notification of any transfer or grant.</p>
	<b>Part 3 - Streets</b>		
1.8	Applicant	<p><u>Article 11 - Temporary stopping up of public rights of way</u></p> <p>For clarity, and with reference to recent DCO precedent, should references made in this Article and elsewhere to "temporary stopping up" be changed to "temporary closure"?</p>	<p>The Applicant acknowledges that recent DCO precedent use the term "temporary closure", rather than "temporary stopping up", however the use of the term "stopped up" is reflected in section 118 (stopping up of footpaths) of the Highways Act 1980. The Applicant also acknowledges the term "temporary stopping up" is used in the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009, and other recently made DCOs including Article 11 (temporary stopping up of rights of way) of The Awel y Môr Offshore Wind Farm Order 2023.</p> <p>The Applicant's drafting at Article 11 addresses those situations where in the interest of clarity a restriction on use, that is by way of a temporary closure, is not an appropriate measure due to the extent and duration of the relevant closure of the public rights of way. The effect of this is that the most appropriate measure is to temporarily extinguish all public rights over the effected public right of way.</p> <p>The Applicant therefore proposes no further amendments to this article.</p>
1.9	Applicant DCC	<u>Article 13 – Traffic regulation measures</u>	The Applicant has inserted a new Article 13(5)(c) to incorporate this wording.

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	Staffordshire County Council (SCC)	With reference to recent DCO precedent, should Article 13(5)(c) be added to ensure adequate notification of the powers under Articles 13(1) and 13(2): <i>“(c) displayed a site notice containing the same information at each end of the length of road affected”?</i>	
1.10	Applicant DCC SCC	<u>Article 13 – Traffic regulation measures</u> With reference to recent DCO precedent, should Article 13(5)(d) be added to ensure that the powers under Articles 13(1) and 13(2) could only be used once relevant traffic management plans are approved: <i>“(d) either— (i) in relation to the construction of the authorised development only, have first obtained approval under requirement 10 for a construction traffic management plan for the phase of the authorised development in relation to which the power conferred by paragraph (1) or (2) is sought to be utilised; or (ii) in relation to the decommissioning of the authorised development only, have first obtained approval under requirement 22 for a decommissioning traffic management plan for the part of the authorised development in relation to which the power conferred by paragraph (1) or (2) is sought to be utilised.”</i>	The dDCO grants consent for traffic regulation measures to be imposed by the Applicant in connection with the construction or the decommissioning of the authorised development such that the additional wording is not considered strictly necessary. However, the Applicant has inserted Article 13(5)(d) to align the Article with Requirement 10 (construction traffic management plan) and Requirement 22 (decommissioning and restoration).
<b>Part 5 – Powers of Acquisition</b>			
1.11	Applicant DCC	<u>Article 31 – Compulsory acquisition of land – incorporation of the mineral code</u> Reference is made to recent DCO precedent where a similar article was removed. a) Would there be any compulsory acquisition of mining rights? b) If not, should Article 31 be removed? c) Please could DCC comment?	(a) The Applicant confirms it is not seeking compulsory acquisition of mining rights. However, this Article has been included as the Book of Reference identifies unknown interests in mines and materials within the Order limits  (b) Article 31 (compulsory acquisition of land – incorporation of the mineral code) has been included on a precautionary basis, as it provides that the Undertaker is prevented from acquiring the rights to any mines and minerals underneath the acquired land, unless expressly purchased, and provides miner owners with the ability to work the mines and extract minerals, subject to restrictions.  (c) No response required.
<b>Part 7 - Miscellaneous/General</b>			
1.12	Applicant SDDC	<u>Article 33 – Removal of human remains</u> Reference is made to recent DCO precedent where a similar article was removed. a) Are there any known burial grounds within the Order limits? b) Would provision for any archaeological human remains be included in the Written Scheme of Investigation secured by Requirement 18 – Archaeology? c) Does it follow that Article 33 can be removed? d) Please could SDDC comment?	(a) The Applicant confirms there are no known burial grounds within the Order limits.  (b) The written scheme for the investigation of areas of archaeological interest to be delivered in accordance with Requirement 18 (archaeology) would provide for the removal of any archaeological human remains found during the construction of the authorised development under the appropriate Ministry of Justice licence. The treatment of any archaeological human remains removed from site would follow requirements for analysis and/or reburial laid out in the written scheme of investigation and licence.  (c) Article 33 (removal of human remains) has been removed from the dDCO to reflect this position.  (d) No response required.

Ref:	Question to:	Question:	Applicant's Response at D4
1.13	Applicant	<p><u>Article 35 - Certification of plans, etc.</u></p> <p>The Applicant [REP1-025] considers that identifying the certified documents on the face of the DCO in a Schedule would be of most assistance to third parties. It has updated Schedule 12 to illustrate its' suggested format, content, and level of detail.</p> <p>The ExA is seeking to ensure that the latest version of every individual document is clearly and unambiguously identified and certified. It notes that, as currently drafted, Schedule 12 includes a single entry for Environmental Statement (ES) Volume 1, Document 6.1, the large number of separate documents that includes, and the potential for a number of those documents to be updated during the Examination. The ExA is concerned that Schedule 12 will become lengthy, in which case it would be preferable for a list of all documents to be certified to be set out in a separate certified document.</p> <p>Please could the Applicant comment further and provide a fully populated draft of Schedule 12 and, as appropriate, a separate certified document well before the final deadline to give enough time for comments to be made?</p>	<p>The Applicant maintains its position [REP1-025] that it is unnecessary to have a certified document setting out the documents to be certified. Schedule 12 of the dDCO [REP3-008] will be fully populated with the necessary detail including dates and revision numbers of the documents to be certified ahead of the close of Examination.</p> <p>With reference to recent DCO precedents, the Applicant considers that the Schedule is of reasonable length and is consistent with recently made orders. The Applicant also considers the setting out of certified documents in a Schedule is consistent with Paragraph 016 Reference ID 04-016-20240430 of the <i>Government's Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects</i> guidance.</p> <p>The Applicant will keep Schedule 12 under review, providing updates at each Deadline as required.</p>
1.14	Applicant	<p><u>Article 39(2) - Arbitration</u></p> <p>For consistency, and with reference to recent DCO precedent, should "shall not" be replaced with "is not"?</p>	<p>The Applicant has revised Article 39(2) (now Article 38(2)) to incorporate this change.</p>
<b>Schedule 1, Part 2 - Requirements</b>			
1.15	SDDC	<p><u>Requirement 5 – Detailed Design Approval</u></p> <p>Is SDDC content that Requirement 5(1) secures sufficient details for detailed design approval? Please provide the reasoning for any addition.</p>	<p>The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.</p>
1.16	Applicant DCC SDDC	<p><u>Requirement 5 – Detailed Design Approval</u></p> <p><u>Design parameters</u></p> <p>DCC [REP1-026] and SDDC [REP1-029] say that it would be helpful to have the design parameters in one certified document.</p> <p>The Applicant [REP1-025, REP3-032] says that the design parameters relied on for the assessment are secured by sub-paragraph (2) of Requirement 5, which requires the detailed design to be in accordance with the principles and assessments set out in the ES and the outline design principles as set out in the design statement. The Applicant has amended sub-paragraph (2) to specifically reference Table 4.2.</p> <p>Table 4.2 is in the Project Description [REP3-023].</p> <p>a) Please could the Applicant either ensure that the Project Description is referenced in Requirement 5(2) of the dDCO and added to the dDCO Schedule 12 – Documents to be Certified, or replicate Table 4.2 in the Design Statement [REP3-027] and update Requirement 5(2) accordingly to refer to that?</p> <p>b) Do DCC or SDDC have any remaining concerns in relation to the identification of design parameters? How might they be resolved?</p>	<p>(a) The Applicant considers that the design parameters are appropriately secured in the dDCO within Requirement 5(2) (detailed design approval), with reference to Article 2 (interpretation) and, as the Design Statement and Chapter 4 (Project Description) will be certified by the Secretary of State under article 34 (certification of plans, etc.) and Schedule 12 (documents to be certified), the Applicant does not propose further amendments to the dDCO to avoid unnecessary duplication and repetition.</p> <p>(b) No response required.</p>
1.17	Applicant EA NE	<p><u>Requirement 8 - Landscape and ecological management plan (LEMP)</u></p> <p>Should it be required for the LEMP to be submitted to and approved by the local planning authority in consultation with the EA and NE?</p>	<p>The Applicant has inserted this drafting into Requirement 8.</p>

Ref:	Question to:	Question:	Applicant's Response at D4
1.18	Applicant SDDC	<u>Requirement 11 - Operational environmental management plan (OEMP)</u> For certainty, to ensure consistency with the ES, and with reference to recent precedent, can it be required for the OEMP to provide details of the solar panel replacement and how this would not lead to any materially new or materially more adverse environmental effects compared to those identified in the ES?	Requirement 11 (operational environmental management plan) has been revised to require details of measures relating to replacement of damaged solar panels in the OEMP.
1.19	Applicant	<u>Requirement 12 – Battery safety management plan (BSMP)</u> Please add the following provision, or similar: <i>“(4) The BSMP must be implemented as approved and maintained throughout the construction, maintenance, operation and decommissioning of the authorised development.”</i>	This provision has been inserted at sub-paragraph (4) of the Requirement 12 (battery safety management plan).
<b>Schedule 1, Part 3 – Procedure for Discharge of Requirements</b>			
1.20	Applicant	<u>Interpretation</u> Reflecting the position of the Secretary of State, and with reference to recent DCO precedent, should the definition of relevant authority for the purpose of the procedure for discharge be amended to: <i>“(a) any body, other than the Secretary of State, responsible for giving any consent, agreement or approval ...”?</i>	This definition has been updated in Paragraph 26(a) (interpretation) of Part 3 (procedure for discharge of requirements) of Schedule 1 of the dDCO.
<b>Schedule 10 – Protective Provisions</b>			
1.21	Applicant	<u>Consistency with recent DCO precedent</u> Please could the Applicant review all Protective Provisions against recent DCO precedent, set out any differences with its proposed Protective Provisions and, as appropriate, either update the Protective Provisions to ensure consistency with that precedent or justify the differences?	<p>In accordance with Paragraph 012 Reference ID 04-012-20240430 of the Government's <i>Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects</i> guidance, the protective provisions differ from recent DCO precedents as each set of protective provisions has been “<i>adapted as necessary so they accurately reflect the proposed development</i>” and commercial negotiations between the Applicant and each of the statutory undertakers.</p> <p>It is not considered appropriate to amend each set of protective provisions to ensure consistency with recent DCO precedents, noting the guidance that “<i>Examining Authorities are expected to ensure that the final form of a recommended DCO contains protective provisions which are bespoke to the application under consideration</i>”.</p> <p>The Applicant has therefore aligned those protective provisions within Part 1 and Part6 of Schedule 10 (protective provisions) with recent DCO precedent where the protective provisions do not apply to named statutory undertakers that are protected by a bespoke set of protected provisions elsewhere in Schedule 10.</p>

2. Land rights, related matters, and statutory undertakers			
2.1	Applicant	<p><u>Statement of Reasons [REP3-015]</u></p> <p>With reference to the Applicant's previous submission [REP1-025 response to question 2.6], please could it update Appendix 1 of the Statement of Reasons to:</p> <ul style="list-style-type: none"> <li>include relevant plot numbers for E.ON UK plc; and</li> <li>ensure that the reference to Elizabeth Goodson/ Elisabeth Albinia Dolben Goodson is consistent with the Book of Reference [REP3-017]?</li> </ul>	The Applicant has updated Appendix 1 of the Statement of Reasons to capture these changes.
2.2	Applicant	<p><u>Draft DCO Article 19 - Compulsory acquisition of rights and restrictive covenants</u></p> <p>The Applicant [REP1-025 response to question 2.13] rephrased Article 19(5) to remove the need for the Secretary of State's consent to transfer the powers under Article 19 to statutory undertakers for the purpose of carrying out their statutory duties. This is inconsistent with recent precedent.</p> <p>Please could the Applicant reinstate the need for the Secretary of State's consent?</p>	The Applicant has reinserted this drafting.
2.3	Applicant	<p><u>Schedule of Progress – Affected Persons [REP3-020]</u></p> <p>Please could the Applicant clarify whether the Option Agreement with Elisabeth Albinia Dolben Goodson is under negotiation or secured/ signed?</p>	The Option Agreement with Elisabeth Albinia Dolben Goodson is under negotiation, only a few points are outstanding and the Applicant expects that the agreement will be completed in October or November 2024.
2.4	National Grid Electricity Transmission Plc National Grid Distribution (East Midlands) plc Cadent Gas Limited	<p><u>Statutory Undertakers' rights and Protective Provisions</u></p> <ol style="list-style-type: none"> <li>Please could the Statutory Undertakers each provide an update on discussions with the Applicant regarding the agreement of the Protective Provisions in Schedule 10 of the dDCO [REP3-008], set out any remaining concerns, and suggest how their issues might be resolved?</li> <li>Please could National Grid Distribution (East Midlands) plc also provide an update on discussions with the Applicant regarding the agreement of an asset protection agreement, set out any remaining concerns, and suggest how their issues might be resolved?</li> <li>Does each Statutory Undertaker maintain objections to the land rights powers sought by the Applicant? What might be done to address any objections?</li> <li>Please could each Statutory Undertaker set out its' position at Deadline 8 of the Examination?</li> </ol>	The Applicant notes that this question is directed at others, and will review responses by other parties at Deadline 4. The Applicant has at Deadline 4 provided an updated Schedule of Progress – Statutory Undertakers and PPs [Doc 3.5] which summarises the Applicant's position.
2.5	Applicant	<p><u>Funding</u></p> <p>Responding to concerns raised by Councillor Amy Wheelton [REP1-038], Diane Abbott [REP1-043], Michael Smith [REP1-045], and Sarah Smith [REP1-047], the Applicant states that in relation to BayWa AG's financial situation:</p> <ul style="list-style-type: none"> <li>the Applicant is part of the renewable energy business, BayWa r.e. AG and that while part of the BayWa AG Group, BayWa r.e. AG operates largely independently of BayWa AG;</li> <li>the renewable energy business has taken direct measures to ensure its financial stability, which have been effective; and</li> <li>the current situation within BayWa AG would not have an impact on the Applicant's ability to deliver projects moving forward.</li> </ul>	The Applicant considers its response in [REP3-031] sets out the firm confidence the Applicant has in its ability to deliver the Proposed Development. As set out at Deadline 3, the Applicant is part of the renewable energy business, BayWa r.e. AG. While part of the BayWa AG Group, BayWa r.e. AG operates largely independently of BayWa AG. However, as an immediate precaution the renewable energy business has already taken direct measures to ensure its financial stability, which have been effective. The current situation within BayWa AG will not have an impact on the Applicant's ability to deliver projects moving forward. Decisions in that regard will remain with BayWa r.e. AG and are independent of the situation at BayWa AG. Business continues as planned and the Applicant remains fully committed to the delivery of Oaklands Farm Solar Park.

	Please could the Applicant provide evidence to substantiate its' position, particularly in relation to confidence in its ability to deliver the Proposed Development in the light of BayWa r.e. AG's financial situation, both now and in the future?	
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3. General and cross-topic planning matters			
3.1	Applicant	<p><u>Statements of Common Ground (SoCG)</u></p> <p>Deadlines for the Applicant' updates are provided in the <a href="#">Examination Timetable</a>. Appendix G of the ExA's Rule 6 Letter <a href="#">[PD-006]</a> sets out a request for SoCG between the Applicant and various parties. Appendix D requests for a document to accompany the SoCG, setting out:</p> <ul style="list-style-type: none"> <li>• the status of each SoCG;</li> <li>• the matters agreed;</li> <li>• the main outstanding concerns held by each Interested Party, the reasons for those concerns, the next steps to be taken to address them, and the progress anticipated by the next Deadline and by the close of the Examination; and</li> <li>• when it is anticipated that any draft SoCG will be finalised and when the finalised signed and dated copies will be submitted to the Examination.</li> </ul> <p>The ExA welcomes the Applicant's Summary of the Status of SoCG <a href="#">[REP3-029]</a>.</p> <p>The ExA would like to ensure that there is time in the Examination to consider clarifications to matters raised in the SoCG, including anything not agreed between the parties.</p> <p>Please could the Applicant provide the document requested in Appendix G of the ExA's Rule 6 Letter <a href="#">[PD-006]</a> together with draft or final signed copies of all SoCG at Deadline 4?</p>	<p>The Applicant is continuing to advance discussions regarding SoCGs with the various parties and has provided a further update of its Summary of the Status of SoCGs at Deadline 4, together with a signed version of the SoCG with Historic England.</p> <p>The Summary of the Status of SoCGs document records that whilst it is not been possible to provide draft or signed SoCGs between the Applicant and Natural England, and between the Applicant and SDDC and DCC, both of those parties are in receipt of a draft SOCG for their review and the Applicant is engaged in ongoing discussions with them. The Applicant intends to provide an update to the ExA in early October 2024, prior to the agenda for the October 2024 Issue Specific Hearing being finalised and released.</p> <p>The Applicant notes that the EA have provided its Work Package Tracker at Deadline 4, which records the position between the two parties.</p> <p>The Applicant is continuing to progress discussions regarding a SoCG with National Grid.</p>
3.2	DCC SDDC Applicant	<p><u>Local Planning Authority (LPA) resources</u></p> <p>DCC and SDDC <a href="#">[REP2-001]</a> raise concerns about their resources for the consideration of any submissions, approvals and monitoring necessary for impact mitigation.</p> <p>The Applicant <a href="#">[REP3-033]</a> refers to Article 30 (fees) of the Part 3 of Schedule 1 of the dDCO <a href="#">[REP3-008]</a> and says that it is willing to discuss resourcing matters with the LPA in respect of Requirements and Obligations.</p> <p>a) Please could DCC and SDDC set out any remaining concerns, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</p> <p>b) Please could the Applicant comment?</p>	<p>(a) No response required.</p> <p>(b) The Applicant has provided SDDC and DCC with a draft SoCG ahead of Deadline 4 which proposes that a Planning Performance Agreement would be an appropriate mechanism for ensuring that the Local Planning Authorities have the appropriate and necessary resources in place to consider submissions, approvals and to undertake monitoring necessary for impact mitigation.</p> <p>As set out in the Applicant's updates on the progress of SoCG at Deadline 4 [Document 8.0], the Applicant intends to continue to discuss the draft SoCG with SDDC and DCC with the intention of submitting a draft SoCG in early October 2024, following Deadline 4.</p>
3.3	Applicant	<p><u>Construction, operation, and decommissioning stage mitigation measures</u></p> <p>Please could the Applicant review the wording in the following management plans to ensure that the mitigation measures are firmly secured and avoid any ambiguity or imprecision using terms such as "it is envisaged", "are expected", "it is proposed", or "will be able":</p> <ul style="list-style-type: none"> <li>• Outline Construction Environmental Management Plan (Outline CEMP) <a href="#">[REP1-007]</a>;</li> <li>• Outline Operational Environmental Management Plan (Outline OEMP) <a href="#">[REP1-009]</a>;</li> <li>• Outline Landscape and Ecological Management Plan (Outline LEMP) <a href="#">[REP1-015]</a>; and</li> </ul>	<p>The Applicant has updated the Outline CEMP [6.1 - ES – Appendix 4.3], Outline OEMP [6.1 – ES – Appendix 4.4], Outline DEMP [6.1 - ES – Appendix 4.5] and Outline LEMP [6.1 – ES – Appendix 5.6] to ensure mitigation measures are firmly secured and avoid any ambiguity, where practicable. Clean and track changed versions of these documents have been submitted at Deadline 4.</p>



		<ul style="list-style-type: none"> <li>Outline Decommissioning Environmental Management Plan (Outline DEMP) [REP1-011]?</li> </ul>	
3.4	<p>Applicant</p> <p>SDDC</p> <p>DCC</p> <p>Leicestershire County Council (LCC)</p> <p>SCC</p>	<p><u>Solar panel and battery storage replacement during the operation stage</u></p> <p>The Applicant [REP1-025 response to question 4.2] states that solar panels are not expected to be replaced during the operational life of the project, save for individual instances of damage or unexpected failure of specific panels, and that to account for this an annual replacement rate of 0.2% per year has been assumed in the ES [REP3-021 Table 13.3]. Battery cells replacement is anticipated to be once every 8 to 10 years depending on the final installed system and the operations profile. It considers that mitigation measures are secured within the Outline CEMP [REP1-007] and Outline Construction Traffic Management Plan (Outline CTMP) [REP1-021], and summarised in the ES [REP3-021 paragraph 13.59].</p> <p>The ExA notes the potential for adverse impacts in relation Heavy Goods Vehicle (HGV) movements during the operation stage, including for the replacement of solar panels and other equipment, in various chapters of the ES. It is seeking to ensure that appropriate precision and clarity is provided for related mitigation during the operation stage.</p> <p>Responding to similar concerns, paragraphs 2.2.3 and 2.2.5 of the <a href="#">Mallard Pass Solar Farm Outline OEMP</a> limit the maximum number of daily HGV movements during operation and requires the relevant planning authority to confirm that any maintenance activities involving panel replacement would not lead to such materially different effects. The <a href="#">Mallard Pass Solar Farm DCO</a> provides that the definition of “maintain” does not include remove, reconstruct or replace the whole of Work No. 1 at the same time and for such works not to give rise to any materially new or materially different environmental effects than those identified in the ES for the operation of the authorised development. The ExA is considering whether to adopt a similar approach.</p> <p>a) Please could the Applicant suggest updates to the dDCO [REP3-008] and Outline OEMP [REP1-009]?</p> <p>b) Please could SDDC, DCC, LCC and SCC comment at Deadlines 4 and 5, setting out any concerns and how they might be resolved?</p>	<p>a) Requirement 11 (operational environmental management plan) has been revised to incorporate the inclusion of this detail (i.e., measures for the replacement of damaged solar panels) in the OEMP. Similarly to the Mallard Pass Solar Farm Outline OEMP (Paragraph 2.2.5), no replacement of the solar panels would be able to take place until the Local Planning Authority has confirmed that they agree that the activities will not lead to materially new or materially different environmental effects (including traffic impacts in relation to HGVs) to those identified in the assessment of the operational phase in the ES.</p> <p>As the number of HGVs required for the replacement of solar panels (for repair purposes) will be managed through the discharge of the OEMP (secured by Requirement 11 of the dDCO), the Applicant does not think it is necessary to limit the maximum number of daily HGV movements in the Outline OEMP.</p> <p>Following a review of other recent DCO precedents, there is no mention of operational HGVs and limits in the Outline OEMP or ExQs for Gate Burton Energy Park or Cottam Solar Project. There is reference to HGVs in the Sunnica Energy Farm ExQs however, it was concluded that there would be no HGV movements, with the exception of planned maintenance, which will be agreed with the LPAs as set out in the OEMP. This further justifies the Applicant’s position that it is unnecessary to limit the maximum number of daily HGV movements in the Outline OEMP.</p> <p>The Outline OEMP (Paragraph 3.1.4) has been updated for Deadline 4 and sets out further detail on the replacement of solar panel during operation, for the purpose of repair.</p> <p>b) No response required</p>

4. Need case, effects on climate change, alternatives, electricity generation, and grid connection			
4.1	Applicant	<p><u>Grid connection agreement</u></p> <p>The Applicant [REP1-025 response to question 4.3] appears to suggest that the redacted agreement provided at Appendix B confirms that “import and export capacity to deliver the Proposed Development is secured”. The submitted documentation makes no reference to the capacity of any secured grid connection.</p> <p>Please could the Applicant provide the relevant evidence?</p>	<p>The referenced document [REP1-025 response to question 4.3, Appendix B] submitted by the Applicant summarises the key information to evidence the secured grid connection agreement with National Grid Electricity System Operator Limited. The Connection Agreement documentation is extensive and contains sensitive commercial information, and therefore the Applicant provided the relevant pages in a consolidated document to evidence the secured grid capacity as requested.</p> <p>[REP1-025, response to question 4.3, Appendix B, provides the signature pages with reference to the Bilateral Connection Agreement and Construction Agreement, which form part of the suite of connection agreement documents. This document also contains the import and export capacity secured in the Connection Agreement on page 5 – the export capacity of 162.3 MW (Alternating Current, AC) is stated in “Part 2 Transmission Entry Capacity”, and the import capacity of 37.5 MW (AC) is stated in “Part 7 Enduring Demand”.</p>

5. Project lifetime and decommissioning			
5.1	Applicant DCC SDDC EA NE	<p><u>Outline DEMP [REP1-011]</u></p> <p>DCC [REP1-026] considers that it is necessary to understand the end state of the land following decommissioning, and its suitability of other uses, including agriculture, if the full impact of the proposal is to be understood prior to consenting, and suggests that this must be addressed in the DEMP. SDDC [REP1-029] considers that it is necessary, reasonable, and appropriate for the definition of the end state after decommissioning to be secured by the dDCO [REP3-008].</p> <p>The Applicant [REP1-025, REP3-032] refers to Requirement 22 of the dDCO [REP3-008], says that decommissioning would be carried out in accordance with the relevant legislation and policy in force at the time of decommissioning, that it is not considered necessary or appropriate to include further detail in the dDCO [REP3-008], and that its approach is consistent with recent precedent.</p> <p>The ExA is considering the extent to which it would be appropriate for the mitigation of impacts from decommissioning to require measures to be taken during detailed design, construction, operation, and maintenance, and whether this would benefit from more consideration of the potential end state after decommissioning now and when detailed mitigation plans would be finalised. Would consideration of the end state and decommissioning at all stages of the Proposed Development be appropriate in relation to the effective and efficient mitigation of long-term adverse effects and are there any specific examples of where this might be beneficial or unhelpful.</p> <p>a) Please could the Applicant, DCC, SDDC, EA, and NE comment?</p> <p>b) Do DCC, SDDC, EA and NE have any comments on the Outline DEMP [REP1-011]? How should their concerns be addressed?</p>	<p>a) The anticipated end state after decommissioning is defined within the Outline Decommissioning Environmental Management Plan (ODEMP) [6.1 – ES – Appendix 4.5]. The detail included in the ODEMP has been forward planned sufficiently so that decisions made now do not impede the ability to effectively decommission in the future. Design decisions have been, and will be, planned to ensure that decommissioning can be undertaken effectively.</p> <p>Requirement 22 (decommissioning and restoration) necessitates that the undertaker submits a final DEMP and decommissioning traffic management plan for prior approval, and to decommission the Proposed Development in accordance with the approved plans. This approach will ensure that the Local Planning Authorities have the opportunity to determine the acceptability of the end state after decommissioning, in line with the relevant legislation and policy in force at that time. This will ensure that through the design, operation, maintenance, decommissioning phases of the Proposed Development, the desired end state (as specified in the final DEMP submitted under Requirement 22) would be achieved.</p> <p>As per Requirement 22, the final DEMP needs to be submitted within three months of the date that the undertaker decides to decommission any part of the solar farm works and grid connection works. Therefore, the full DEMP will be up-to-date with relevant legislation and policy in force at the time of decommissioning.</p> <p>The Applicant has therefore inherently considered, and will continue to consider, the end state and decommissioning of the Proposed Development such that no further action at this time is considered necessary.</p> <p>b) No response required.</p>

5.2	Applicant DCC SDDC EA	<p><u>Decommissioning of underground cables</u></p> <p>DCC [REP1-026, REP2-001] and SDDC [REP1-029, REP2-001] consider that leaving underground cables in place would prevent suitable reinstatement of land drains, or appropriate decompaction of the soil, may inhibit mole ploughing/ subsoiling, and prevent the land from being returned to BMV condition. They say that the decomposition of cabling materials could leach contaminants into the soil and water resources. The councils suggest that the dDCO [REP3-008] should require the underground cables and ducting to be removed, although SDDC [REP1-029] advise that removal would undo soil improvements that have taken place during the 40 fallow years.</p> <p>The EA [REP1-032] say that the approach to decommissioning cables should depend upon a site-specific risk assessment being carried out prior to decommissioning and expect to work with operators to agree best available environmental options. It notes that leaving cables in place could fall under the definition of waste.</p> <p>Councillor Amy Wheelton [REP1-039] considers that leaving the cables in place would make the land incapable of returning to agricultural use due to the implications for drainage, whereas if they are dug out the previous 40 years fallow would be rendered a waste of time.</p> <p>The Applicant [REP3-031, REP3-032, REP3-033] seeks an appropriate level of flexibility which would allow some cables to be left in place should an assessment of the situation at the decommissioning stage determine that to leave cables in place would be environmentally preferable, having regard to factors such as the condition of the land at that time, potential disturbance from the removal of the cables, and any contamination risks which could arise from the cables being left in place.</p> <p>a) Please could the Applicant consider the potential for the cables to be installed in such a manner as to mitigate the overall likely adverse impacts most effectively, for example by maximising the likelihood of it being acceptable for them to be left in place by mitigating long-term drainage, agricultural, contamination, and waste impacts? Should the dDCO [REP3-008] secure that this be considered during detailed design and subject to approval by the local planning authority in consultation with the EA?</p> <p>b) Please could DCC, SDDC and the EA comment?</p>	<p>a) The Applicant has considered how cables could be installed in order to mitigate adverse effects most effectively, and is confident that Low, Medium and High voltage electrical cables would be buried to such depth (0.7 m minimum) so as not to interfere with typical agricultural activities or preclude the use of drainage solutions such as land drains or mole ploughing (plough depth is widely considered to be 0.2 - 0.4 m depth).</p> <p>Therefore, upon decommissioning, leaving cables in situ at greater depths, would not prevent drainage measures such as land drains, or mole ploughing at shallower depths, from being utilised beyond decommissioning. Therefore, leaving cables in situ would not adversely impact the ability of the land to return to agricultural use.</p> <p>Underground electrical cable arrangements and depths are shown in the ES at Figure 4.14: "Indicative Underground Cabling Installation" [APP-098], with minimum cable depth of Low and Medium voltage cables shown at 0.7 m. The High voltage cable from the onsite substation to National Grid's Drakelow substation is shown in Figures 4.15 a &amp; b [APP-098], with minimum depth of cable at 0.9 - 1.0 m. It is noted that warning tape would be placed at approximately 0.4 m depth for safety purposes, and a very thin earthing cable would be placed at approximately 0.5 m depth, however, these features would have no impact on agriculture or drainage solutions.</p> <p>The Applicant agrees with the EA that the approach to decommissioning cables should depend upon a site-specific risk assessment being carried out prior to decommissioning. Alongside other considerations, such as ecology and soil impacts, such risk assessment would include consideration of drainage to ensure that the land will be capable of hosting agricultural activity once decommissioning is complete. The drainage assessment would consider if electrical cables needed to be removed to facilitate drainage measures such as land drains (installing new, or improving existing drains), and if mole ploughing / subsoiling would be possible with the cables in situ. Based on this risk assessment as part of decommissioning planning, a decision will be made on whether cables are to be removed or left in situ (or if certain cables should remain in situ with the remainder being removed, as appropriate).</p> <p>The Applicant does not consider the dDCO [REP3-008] should require the underground cables and ducting to be removed as a blanket rule. SDDC [REP1-029] advise that removal of underground cables would undo soil improvements that have taken place during the 40 fallow years, and Councillor Amy Wheelton also supports this view [REP1-039].</p> <p>The Applicant's proposed approach to leaving cabling in situ would ensure the improvements to soil quality during the operational phase of the Proposed Development are not undone, and this approach is in accordance with Paragraph 2.10.69 of NPS EN-3 which states "Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling...".</p> <p>This approach is established and consistent with recent solar DCO precedent, whereby contamination from cables left in situ is not considered a significant risk.</p>

			<p>Cables are usually cut, capped and left in the ground, and there are no known issues with leaching of contaminants. Oil or fluid filled cables can be drained, flushed and capped and left in situ with ongoing monitoring and inspection. Contamination and mitigation measures (as appropriate) will be set out in the DEMP. Waste associated with removal of cables (if required) will also be considered in the DEMP and follow best practice at the time of decommissioning.</p> <p>The requirement to undertake full assessment, including drainage, prior to decommissioning is secured through Requirement 22 (decommissioning and restoration), with an obligation on the Applicant to provide a final DEMP to be reviewed and approved by the local planning authorities at least 3 months prior to decommissioning commencing. Through the preparation of the final DEMP, it may be determined by the local planning authorities and the Applicant that it is optimal for the environment to remove all underground cables, however, this should be determined with knowledge of the relevant legislation and best practice at the time of decommissioning.</p> <p>Requirement 22 also ensures the local planning authorities have sufficient control to stipulate this requirement at the point of decommissioning, should it be determined that removal of cables is the optimal solution. Therefore, the Applicant reiterates that flexibility should be maintained in the dDCO so that the optimal solution can be pursued at the time of decommissioning.</p> <p>The Applicant has added text to the Outline DEMP (Section 3.1) to provide a firm commitment to considering drainage at the point of decommissioning. The impact of decommissioning on drainage will be considered in line with best practice and legislation at the time.</p> <p>The Applicant has also added a minimum depth of cables to Table 4.2 in the ES, re-submitted at D4.</p> <p>(b) No response required.</p>
5.3	Applicant	<p><u>Securing funding for decommissioning</u></p> <p>DCC [REP1-026] and SDDC [REP1-029] say that a provision should be added to the dDCO [REP3-008] to secure funding for decommissioning to provide certainty that adequate funding arrangements are in place to reinstate the land appropriately. They suggest that all works identified in the Outline DEMP [REP1-011], including hedgerow restoration and the removal of cables and ducting, can be costed now and that this amount can then be held in an index/ inflation linked escrow account or bond and secured.</p> <p>The Applicant [REP1-025, REP3-031, REP3-032] considers that it is not necessary to include a provision to secure funding for decommissioning, as the decommissioning of the site is secured through Requirement 22 of the dDCO [REP3-008] which is legally enforceable, and that its approach is consistent with recent precedent.</p> <p>Please could the Applicant comment on the potential for decommissioning not to be completed, including in the context of the commercial and financial considerations that the undertaker (which may not be the Applicant) might have at that time? How can the ExA be satisfied that decommissioning would be completed if funding is not secured in advance?</p>	<p>The Applicant considers that the proposed securing of decommissioning funds within the dDCO is highly unusual and has no precedent in comparative schemes. The Applicant maintains there is no justification for a decommissioning fund to be put into place.</p> <p>Requirement 22(1) (decommissioning and restoration) requires the decommissioning of the authorised development no later than 40 years following the date of final commissioning of the first phase of Work No. 1 as notified by the undertaker under Requirement 4 (phasing of the authorised development and date of final commissioning).</p> <p>In the event this Requirement is not complied with by the undertaker at the time of decommissioning, there will be a breach of the terms of the order granting development consent and criminal proceedings could be initiated against the undertaker in accordance with section 161 of the Planning Act 2008.</p> <p>The Applicant maintains its position in [REP1-025, REP3-031 and REP3-032] that it is not necessary to include a provision to secure the funding for decommissioning within Requirement 22 (decommissioning and restoration) as:</p>

			<p>(a) in the event the benefit of the Order was transferred to a different undertaker, that new body would become responsible for the authorised development and for complying with the terms of the DCO. Therefore, the presence of the criminal liability imposed by section 161 of the Planning Act 2008 will persist against any new undertaker regardless of their financial position; and</p> <p>(b) the Applicant considers that as failing to comply with a Requirement is a criminal offence, confidence is provided that decommissioning will be carried out appropriately, irrespective of who may be the undertaker at the relevant time.</p> <p>As regards the Applicant's ability to fund decommissioning, the information provided in its Funding Statement is comprehensive and aligns with the approach accepted by the Secretary of State in recent DCO precedents and decision letters. The Applicant has demonstrated it has sufficient funds to construct, operate and decommission the scheme and no further information is considered necessary. Should the benefit of the Order be transferred to another undertaker, the Secretary of State can consider whether any transferee can similarly meet those tests.</p> <p>The Applicant's approach and its position that it is not appropriate for a decommissioning bond to be secured under the DCO is consistent with recent DCO precedents and no further action is proposed.</p>
5.4	Applicant	<p><u>Securing decommissioning timescales</u></p> <p>DCC [REP1-026] considers that a dDCO [REP3-008] requirement for decommissioning and restoration to be completed within a specified timescale would add certainty to the decommissioning process and give assurance to landowners about the return of the land and commencement of future uses. SDDC [REP1-029] state that such a requirement should be provided and that up to two years is acceptable. The EA [REP1-032] suggest that such a requirement would ensure that decommissioning is done and would enable enforcement.</p> <p>DCC [REP1-026] consider that commencement and completion of the decommissioning phase should be linked to the cessation of energy generation if earlier than 40 years following the date of final commissioning of the first phase of Work No. 1. SDDC [REP1-029] consider that timescales should be identified in case a unit fails or is left dormant/ derelict some time before the 40-year life has expired. The EA [REP1-032] suggest that it be required for decommissioning to be completed within two years of energy generation ceasing or within two years after the 40-year expiry date, whichever is sooner.</p> <p>The Applicant [REP1-025, REP3-032] says that a requirement to secure the decommissioning and restoration of the site within a specified timescale is not necessary as there are factors outside the control of the Applicant that could lead to delay and that no timescale is required other than provided by Requirement 22 of the dDCO [REP3-008], whereby decommissioning is to commence no later than 40 years following the date of final commissioning of the first phase of Work No. 1. The Applicant notes that its approach is consistent with recent precedent.</p> <p>The ExA notes the various submissions and is considering whether it is appropriate to secure provisions to limit the duration of any periods when the benefits of electricity generation and storage of all or part of the Proposed Development do not offset the various adverse impacts at that time. The ExA is considering if it is necessary to secure for the decommissioning and restoration of any part of the Proposed Development to be completed within two years of that part not being necessary for the generation or storage</p>	<p>The Applicant's approach is consistent with recent DCO precedents.</p> <p>The early decommissioning of any part of the authorised development is already provided for in Requirement 22(1) such that the Applicant considers the IPs' concerns have been proportionately and appropriately dealt with as any decommissioning of the authorised development, whether in part or whole, must be undertaken in accordance with the decommissioning environmental management plan(s), to be submitted to the local planning authorities.</p> <p>The Applicant considers that the Planning Act 2008 provides sufficiently robust enforcement provisions, including section 161 of the Planning Act 2008, which ensures decommissioning will be completed and that any breach of Requirement 22 could be properly enforced.</p> <p>The Applicant therefore considers that no further action is required.</p>

		of electricity, or within 42 years following the date of final commissioning of the first phase of Work No. 1, whichever is earlier. Please could the Applicant comment?	
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6. Agriculture, land use, soils, ground conditions, minerals, and geology			
6.1	Applicant NE SDDC	<p><u>Agricultural Land Classification (ALC)</u></p> <p>NE [AS-022, REP1-037] raise various concerns regarding ALC, including:</p> <ul style="list-style-type: none"> <li>• where BMV is not expected then a semi detailed survey (1 auger per 2 ha plus representative pits) will suffice;</li> <li>• in areas that BMV is expected then a full ALC (1 auger per ha plus representative pits) must be undertaken;</li> <li>• it does not concur with the assumption that land quality is mostly 3b within the cable route;</li> <li>• an ALC survey should be undertaken on the cable route;</li> <li>• in the absence of a detailed survey for most of the cable corridor it is impossible to provide an accurate baseline and demonstrate the likely potential impacts;</li> <li>• the survey requires an experienced ALC surveyor to make the correct professional judgements;</li> <li>• detail should be provided of the professional credentials and experience required of soil scientists (surveyors) experience carrying out ALC; and</li> <li>• the ALC survey will inform the Soil Management Plan.</li> </ul> <p>SDDC [REP1-029] consider that the Applicant's ALC and surveys meet the minimum criteria of MAFF 1988, but say that the soil survey work was not supervised/ observed.</p> <p>NE [AS-022] provide detailed comments on the Applicant's ALC undertaken to date and say [REP1-037] that it will provide more detailed comments for Deadlines 2 and 3. The ExA notes that these are yet to be submitted.</p> <p>The Applicant [REP1-023, REP1-025, REP3-032] considers the approach and methodology used within the ALC and surveys to be robust and appropriate. It says that is engaging with NE on a SoCG. It states that it is undertaking further survey work to confirm the ALC on the cable route and will provide an update on the results of the survey at Deadline 4.</p> <ol style="list-style-type: none"> <li>Please could the Applicant clarify the supervision provided for all ALC and surveys, including for the soil survey work on site, setting out the relevant professional credentials and experience of the surveyors/ scientists?</li> <li>Please could NE and SDDC comment on the supervision provided by the Applicant at Deadline 5?</li> <li>Please could the Applicant provide a draft copy of the SoCG with NE at Deadline 4, and set out the ALC matters yet to be agreed with NE and the next steps to be taken to address them?</li> <li>Please could NE and SDDC set out any remaining ALC concerns at Deadlines 4 and 5, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</li> <li>Please could NE and SDDC provide their comments on the results of the Applicant's ALC on the cable route at Deadline 5?</li> </ol>	<ol style="list-style-type: none"> <li>The ALC of the majority area of Oaklands Farm was carried out by Soil Environment Services Ltd. They have revised their ALC plan to address the matters raised by NE. The survey work was carried out and supervised by the following: <ul style="list-style-type: none"> <li>• Louise Tavasso BSc(Hons) MI Soil Sci with 13 years experience;</li> <li>• Dr Robin Davies BSc, PhD, FI Soil Sci, PGC with 25 years experience.</li> </ul> <p>The ALC of Park Farm, and as now extended to cover the whole of the cable route corridor, was carried out on behalf of Kernon Countryside Consultants by Robert Askew BSc(Hons), MSc, FI Soil Sci, CSci. Robert has over 35 years experience.</p> <p>Accordingly all fieldwork and ALC analysis was carried out by experienced and competent professionals. The Applicant's position is that it is not normal practice for soil survey work to be supervised or observed, and not necessary for supervision or observation when the professionals undertaking the work are experienced and professionally qualified.</p> </li> <li>The Applicant will review the responses by NE and SDDC to this part of the question.</li> <li>The Applicant is continuing to engage with NE regarding a SoCG and has provided a full summary of the position of those discussions in its Deadline 4 updated Status of SOCG document [Doc 8.0].</li> <li>The Applicant will review the responses by NE and SDDC to this part of the question.</li> <li>The Applicant will review the responses by NE and SDDC to this part of the question.</li> </ol>
6.2	Applicant	<u>Outline Soil Management Plan</u>	

	NE SDDC	<p>NE <a href="#">[AS-022]</a> comment that the Outline Soil Management Plan should:</p> <ul style="list-style-type: none"> <li>• comply with paragraph 5.1 of the <a href="#">Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009)</a>;</li> <li>• follow the Institute of Quarrying's <a href="#">Good Practice Guide for Handling Soils in Mineral Working</a>;</li> <li>• clarify the level of professional qualification and experience required of the site foreman to ensure that soil handling and storage of soils adhere to the Defra Construction Code of Practice;</li> <li>• set out the target specification for the proposed end uses based on pre-construction ALC grade;</li> <li>• where topsoil is to be stripped, typically for construction compounds; access tracks and laying cabling, the soil handling methodology (movement, storage &amp; replacement) and soil protection proposals are reviewed to ensure that appropriate mitigation is in place to allow for the restoration of the land to the baseline ALC Grade;</li> <li>• avoiding soil handling during October to March inclusive, irrespective of soil moisture conditions;</li> <li>• only allow soils in a dry and friable condition to be handled; and</li> <li>• limit stockpile heights to avoid compaction of soils, typically a maximum of 3m for topsoils and 5m for subsoils.</li> </ul> <p>The Applicant <a href="#">[REP1-023]</a> is drafting a SoCG with NE to ensure all comments are addressed.</p> <ol style="list-style-type: none"> <li>Please could the Applicant provide a draft copy of the SoCG with NE at Deadline 4, and set out the Outline Soil Management Plan matters yet to be agreed with NE, and the next steps to be taken to address them?</li> <li>Please could the Applicant submit the updated Outline Soil Management Plan?</li> <li>Please could NE set out any remaining Outline Soil Management Plan concerns at Deadlines 4 and 5, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</li> <li>Please could SDDC comment at Deadlines 4 and 5?</li> </ol>	<ol style="list-style-type: none"> <li>The Applicant has provided a full summary of the position reached with NE in respect of the SoCG in its Deadline 4 version of the Statements of Common Ground – Status Document [Doc 8.0]. The Applicant is continuing discussions with NE and will provide a further update on the status of the SoCG in early October 2024.</li> <li>The Applicant has updated the Outline Soil Management Plan (OSMP) which is an appendix to the Outline CEMP at Deadline 4. The updates to the OSMP reflect discussions with NE and were sent to NE directly on 1<sup>st</sup> October 2024 for comment.</li> <li>No response required.</li> <li>No response required.</li> </ol>
6.3	Applicant DCC SDDC	<p><u>Loss of BMV agricultural land</u></p> <p>Paragraph 5.11.12 of NPS EN-1 states that Applicants should seek to minimise impacts on BMV agricultural land and preferably use land in areas of poorer quality. Paragraph 2.10.29 of NPS EN-3 says that the use of BMV agricultural land should be avoided where possible.</p> <p>The ES <a href="#">[APP-169]</a> paragraph 15.134] states that the Battery Energy Storage System (BESS) and onsite substation would be removed during decommissioning, but that the land in these areas may not be restored back to the same ALC grade. The BESS and substation would be within a small field of mixed Subgrade 3a and 3b quality. It is indicated that there would be a permanent loss or downgrading of 1.5ha of Subgrade 3a agricultural land if the substation was not removed or suitably restored.</p> <p>The Applicant <a href="#">[REP1-025, REP3-032]</a> says that the BESS and onsite substation is proposed within a relatively small field and anticipates that this area could be restored to BMV status on decommissioning. At Deadline 4 it will submit a Soil Management Plan dedicated to this area to address the removal of topsoil, the management of that material</p>	<ol style="list-style-type: none"> <li>Chapter 3 (Site Selection and Design) of the ES <a href="#">[APP-086]</a> discusses the rationale behind the location of the onsite substation at Paragraph 1.66 and 1.67, with Paragraph 1.68 dealing specifically with the consideration of BMV agricultural land. Paragraphs 1.70, 1.71 and 1.72 provide a similar description of the rationale behind the location of the BESS.</li> </ol> <p>The Design Statement <a href="#">[REP3-027]</a> provides at Paragraphs 8.3.10 – 8.3.12 a summary of the explanation provided in the Preliminary Environmental Information Report produced for the purposes of consultation on the application of the proposed location of the BESS and onsite substation.</p> <p>At the point of the PEIR being produced the indicative layout (Appendix E of the Design Statement) showed the onsite substation being located in what was considered to be the most appropriate location from an operational point of view, in the northern part of the Oaklands Farm array, closest to the point</p>



	<p>for the duration of the consent. It anticipates restoration to comparable quality but cannot be certain of restoration back to the same ALC grade, and therefore considers that it would not be reasonable for the DCO to require no permanent loss of Subgrade 3a agricultural land.</p> <p>a) Please could the Applicant comment on whether the BESS and onsite substation could be located to avoid BMV agricultural land? If not, why not?</p> <p>b) Please could DCC and SDDC comment on the Applicant's Soil Management Plan for the BESS and onsite substation at Deadline 5, set out any remaining concerns and suggest how their issues might be resolved?</p> <p>DCC and SDDC <a href="#">[REP1-026, REP1-029, REP2-001]</a> consider it inevitable that land drains would be compromised by piling, cabling and other infrastructure and that, in the absence of land drains, nutrients would be washed out of the soil and the soil would no longer be BMV agricultural land quality. They also say that soil compaction on soil structure would lead to reduced permeability to water and air as well as increased surface runoff and erosion. The councils consider that the impacts on soil would not be practically reversible in respect of BMV land and that the Proposed Development would result in the permanent loss of BMV land. The councils advise that the Proposed Development site contains soil that is particularly good to produce potatoes, as it is potato cyst nematode free, making the soil even more of a rarity and adding to the BMV value. They consider that the permanent loss of BMV land of the scale proposed is a critical impact and that it is reasonable for the dDCO to require no permanent loss of Subgrade 3a land.</p> <p>Councillor Amy Wheelton <a href="#">[REP1-039]</a> notes that manure is not being added back to the soil to increase the organic matter content, raises concerns about the impact of the piling on the soil structure and land drainage, and considers that the land would be incapable of returning to BMV or any agricultural use as it would no longer be drained.</p> <p>The Applicant <a href="#">[REP3-031, REP3-033]</a> says that although piling may disturb or break up land drains, the number affected is expected to be minimal and in the unlikely event that any significant drainage issue emerges due to construction activity, it would use measures such as SuDS, replacing or repairing land drains to rectify the situation. It considers it likely that there would be an improvement to soil quality as the ground beneath the solar panels would be permanently vegetated whereas with the existing agricultural use there are periods of bare and compacted earth which increase levels of the surface water runoff. It states that the land would be returned to an appropriate condition following decommissioning without compromising soil quality. The Applicant says that the lease requires it to make good the land in no worse state or condition prior to implementing the Proposed Development.</p> <p>c) Please could the Applicant suggest how measures to mitigate the potential for damage to existing land drains and impacts on soil quality can be secured by the dDCO <a href="#">[REP3-008]</a>?</p> <p>d) Please could the Applicant suggest how the condition of the land after decommissioning can be secured by the dDCO <a href="#">[REP3-008]</a>?</p> <p>e) Please could DCC and SDDC comment on the Applicant's suggestions at Deadline 5, set out any remaining concerns and suggest how their issues might be resolved?</p>	<p>of grid connection at Drakelow. That location would have minimised cabling installations and construction costs and was a flat unobstructed area at a low risk of flooding and appropriately screened from nearby properties.</p> <p>From an operational perspective it is preferential to locate the BESS as close as possible to the onsite substation. However as documented at Paragraph 8.3.12 of the Design Statement, it was not considered appropriate at the PEIR stage to propose the BESS adjacent to the onsite substation due to the potential for significant effects on residential amenity. The BESS was shown as being located in its current position, with the field in question being flat, unobstructed and well screened by surrounding topography and existing vegetation, as well as avoiding any mature trees and identified ecological receptors.</p> <p>As documented in Section 8.3.15 of the Design Statement, following statutory consultation the onsite substation was proposed adjacent to the BESS, which increased the distance between the substation and the nearest residential properties and was considered by the Applicant to be an improvement in terms of landscape and visual impact compared to the PEIR proposal.</p> <p>The Design Statement and Chapter 3 of the ES demonstrate that a careful and considered approach was taken during the preparation of the Application to the proposed layout. The Applicant's position is that it would not be possible to relocate the BESS and onsite substation to a parcel of land within the Order Limits which is similarly flat and unobstructed in order to avoid BMV agricultural land, without giving rise to potentially significant environmental impacts in terms of matters such as landscape and visual impacts, arboricultural and ecological impacts or residential amenity.</p> <p>The Applicant will review responses by DCC and SDDC, but confirms it has taken a precautionary approach to environmental assessment by assuming that the very small amount of BMV land in the BESS and onsite substation areas (1.5ha of Subgrade 3a, and 0.3ha of Subgrade 3b) may not be restored back to the same ALC grade once the Proposed Development is decommissioned.</p> <p>b) The Applicant will review any responses by DCC and SDDC and provide further comments at Deadline 5 if required.</p> <p>c) The Applicant has committed through Section 2.6.5 of the OCEMP to rectify construction-related surface drainage issues as required, including solutions such as repairing or replacing land drains as required, or alternative measures such as SuDS, as appropriate. Compliance with the OCEMP is secured through Requirement 9 (construction and environmental management plans) of the dDCO, which ensures that potential damage to existing land drains is mitigated.</p> <p>The OCEMP and the ODEMP also include an Outline Soil Management Plan (OSMP), which sets out both good practice and bespoke mitigation measures to minimise effects on the nature and quality of the soil, both during the construction of the Proposed Development and its subsequent decommissioning. The OCEMP is secured through Requirement 9 of the</p>
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			<p>dDCO and the ODEMP through Requirement 22 (decommissioning and restoration). The OSMP will mitigate the potential for impacts on soil quality.</p> <p>d) Requirement 22 of the dDCO requires the undertaker to submit for approval, prior to decommissioning, a Decommissioning Environmental Management Plan, which must be substantially in accordance with the relevant parts of the outline Decommissioning Environmental Management Plan. The approval of the DEMP requires the undertaker to provide details of the condition of the land following decommissioning, and for the local planning authority to approve those details ensuring the condition of the land following decommissioning is therefore secured through Requirement 22 of the dDCO.</p> <p>e) The Applicant will review any responses by DCC and SDDC and provide further comments at Deadline 5 if required.</p>
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7. Biodiversity			
7.1	Applicant NE	<p><u>River Mease Special Area of Conservation (SAC)</u> <u>River Mease Site of Special Scientific Interest (SSSI)</u></p> <p>NE [AS-022, REP1-037] is not satisfied with the Applicant's assessment of the impacts on the River Mease SAC or that it can be ascertained beyond reasonable scientific doubt that the Proposed Development would not have an adverse effect on its integrity. NE notes a potential pathway for the mobilisation of sediment during the construction and operation stages. It also considers that there is a lack of clarity around the maintenance strategy, including the use of chemicals in the cleaning of the panels which has the potential to impact the designated features. It refers to discussions with the Applicant regarding this and says there are mitigation measures available to prevent potential impacts on the designated features using Sustainable Drainage Systems (SuDS).</p> <p>SDDC [REP1-029, REP2-001] raise concerns about mobilisation of sediment and the use of chemicals, and suggest incorporating SuDS as mitigation, as does DCC [REP1-026]. SDDC provides evidence of the presence of otter on the watercourses connected with the Proposed Development and the potential for adverse impacts on them, including in combination with the proposed Energy Storage System at Fairfield Farm, Rosliston Road, Walton-on-Trent.</p> <p>The Applicant [REP1-023, REP1-025, REP3-032] predicts no adverse effects of the Proposed Development on the integrity of the SAC either alone or in-combination with other plans and projects. It suggests that there would not be an increase in the mobilisation of sedimentations as rainfall would be intercepted and buffered by the vegetation growing underneath the panels and retained prior to infiltration as with the greenfield situation. It considers that the impact of the panels on runoff would be positive as vegetation would be in place all year round and the underlying soil would not be left bare or compacted by agricultural activities. It says that the cleaning of the solar panels is unlikely to require the need to use harsh chemicals and that any potential additional mitigation would be detailed in the Outline OEMP [REP1-009].</p> <p>a) Please could the Applicant set out the consideration given to the River Mease SAC and SSSI during the operation and decommissioning stages? Please could NE and</p>	<p>a) The position with NE has evolved since the ExQ2 were issued. Correspondence was received from NE on 12<sup>th</sup> September 2024 stating it is agreed that <i>"SuDS are not required and that the removal of annual inputs from intensive agriculture will provide an overall improvement in water quality"</i>. No adverse effects on the integrity of the SAC were predicted either alone or in-combination with other plans and projects. The Applicant understands that NE is now in agreement that the Proposed Development does not adversely effect the integrity of the River Mease SAC and confirmation of this is sought through the Statement of Common Grounds (SoCG).</p> <p>In the correspondence on 12<sup>th</sup> September 2024, NE suggested that to <i>"help eliminate any possibility of sediment run off during construction and the early operational phase would be to sow and establish the grassland within the Mease catchment at the earliest possible opportunity"</i>. The Applicant can commit to sowing and establishing the grassland in the area of the Site within the River Mease Catchment at the earliest opportunity. A commitment to this has been added to the oLEMP, updated for Deadline 4.</p> <p>A commitment to not using harsh chemicals during the cleaning of solar panels has been added to Section 4.2 of the oOEMP, updated for Deadline 4. Cleaning will take place approximately once per year. This is secured through Requirement 11 (operational environmental management plan) of the dDCO.</p> <p>Decommissioning impacts on the River Mease SAC and SSSI will be no worse than those anticipated during construction.</p> <p>Consideration has been given to the River Mease SAC and SSSI during operation and decommissioning.</p> <p>b) No response required.</p>

		<p>SDDC comment on that at Deadline 5, and set out any concerns and how they might be addressed?</p> <p>b) Please could NE provide a detailed response to the Applicant's reasoning that the Proposed Development would reduce the mobilisation of sediment?</p> <p>c) Does NE still consider that the Proposed Development would have a Likely Significant Effect on the River Mease SAC, either alone or in-combination with other projects?</p> <p>d) Can NE advise if the Proposed Development should progress to Stage 2 to consider if the Proposed Development may have an adverse effect on the integrity of the River Mease SAC?</p> <p>e) Please could the Applicant advise whether it will submit a Statement to Inform Appropriate Assessment?</p> <p>f) Please could the Applicant set out how mitigation in relation to chemical cleaning of the solar panels is secured? Please could NE and SDDC comment on the Applicant's response at Deadline 5, and set out any concerns and how they might be addressed?</p> <p>g) Do NE or SDDC have any concerns about otters in relation to the River Mease SAC or SSSI?</p> <p>h) Do NE or SDDC have any other concerns in relation to the River Mease SAC or SSSI?</p>	<p>c) No response required.</p> <p>d) No response required.</p> <p>e) Environmental Statement (ES) Appendix 6.2 – Report to Inform HRA (Document Reference: EN010122/APP/6.1/Appx 6.2) was submitted as part of the Application.</p> <p>f) As set out in response to ExQ 7.1(a) above, a commitment to not using harsh chemicals during the cleaning of solar panels has been added to Section 4.2 of the oOEMP, updated for Deadline 4. Cleaning will take place approximately once per year. This is secured through Requirement 11 of the dDCO.</p> <p>g) No response required.</p> <p>h) No response required.</p>
7.2	Forestry Commission SDDC	<p><u>Woodland bordering the former Drakelow Power Station site</u></p> <p>The Forestry Commission [RR-095] considers that the woodland bordering the former Drakelow Power Station site, listed on the Arboricultural Report as Woodlands 8, 9 &amp; 10 are Lowland Mixed Deciduous Woodland on the Priority Habitat Inventory (England) and therefore recognised under the UK Biodiversity Action Plan as being the most threatened and requiring conservation action.</p> <p>The Applicant [REP1-023] applies the habitat type of Other Woodland; Broadleaved rather than Lowland Mixed Deciduous Woodland due to the quality of the habitat present, which it considers do not meet the criteria for the Lowland Mixed Deciduous habitat type, including because of the presence of sycamore and the mixture of broadleaved and coniferous species.</p> <p>The Applicant [REP1-023, REP3-030] is updating the Arboricultural Survey Report [APP-133] to provide further detail of the approach to be taken to the construction of the access and cable route at the Drakelow Power Station and anticipates providing the update at Deadline 4.</p> <p>a) Are the Forestry Commission and SDDC satisfied with the Applicant's explanation for categorisation as Other Woodland; Broadleaved? If not, why not?</p> <p>b) Please could the Forestry Commission and SDDC comment on the updated Arboricultural Survey Report at Deadline 5, set out any remaining concerns and suggest how their issues might be resolved?</p>	<p>The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.</p>
7.3	Applicant SDDC DCC	<p><u>Draft DCO [REP3-008] Article 37 - Felling or lopping of trees or removal of hedgerows</u></p> <p><u>Draft DCO [REP3-008] Article 38 - Trees subject to Tree Preservation Orders.</u></p> <p>The Applicant [REP1-025, REP3-032] considers that the broad powers to fell or lop any tree, or shrub near any part of the authorised development, or cut back its roots, without</p>	<p>As regards Article 38 (trees subject to tree preservation orders), the Applicant maintains its position in [REP1-025 and REP3-032] and acknowledges its approach is consistent with Paragraph 015 Reference ID 04-015-20240430 of the Government's <i>Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects</i> guidance, which states in relation to powers effecting trees subject to Tree Preservation Orders, "the key</p>

		<p>the Local Planning Authority's consent is to ensure that the Proposed Development could be delivered in good time and without unreasonable delay.</p> <p>DCC [REP1-026] considers that it is necessary for SDDC's prior consent to be required for the removal to fell or lop trees. SDDC [REP1-029] require the power to consent on the removal to fell or lop trees.</p> <p>The ExA is considering whether the broad powers requested by the Applicant are justified, whether it is reasonable to consider that delay could be avoided by planning and obtaining consent for such works in advance, and if it would be helpful for consent to be deemed if it isn't provided within 28 days of an application for consent. The ExA is considering whether a provision regarding the quality of the works might be helpful, as provided for <a href="#">Sunnica Energy Farm</a>: "to ensure all works are carried out to a reasonable standard in accordance with the relevant recommendations of appropriate British Standards or other more suitable recognised codes of good practice provided these meet or exceed the appropriate British Standards". The ExA is thinking about whether greater control should be provided for trees subject to Tree Preservation Order than for other trees and shrubs.</p> <p>Please could the Applicant, SDDC and DCC comment?</p>	<p>requirement is to clearly set out the conditions which must be met before the power can be used."</p> <p>The Applicant has complied with this key requirement and notes there is no reference in the guidance to further approvals being required, on the basis that the dDCO provides the consent for such works. Detail of the specific works that may impact a tree subject to a tree preservation order cannot be provided in a Schedule to the dDCO for the reasons provided by the Applicant in [REP1-025].</p> <p>The Applicant's approach is also consistent with recent DCO precedents including Article 39 (trees subject to tree preservation orders) of The Cottam Solar Project Order 2024, Article 37 (trees subject to tree preservation orders) of The Gate Burton Energy Park Order 2024 and Article 36 (trees subject to tree preservation orders) of The Sunnica Energy Farm Order 2024.</p> <p>No further action is therefore proposed in respect of this article.</p> <p>The Applicant has inserted the suggested text "ensure all works are carried out to a reasonable standard in accordance with the relevant recommendations of appropriate British Standards or other more suitable recognised codes of good practice provided these meet or exceed the appropriate British Standards" at Article 36(2) (as re-numbered from Article 37 in the dDCO submitted at Deadline 4) (felling or lopping of trees or removal of hedgerows) of the dDCO for consistency with The Sunnica Energy Farm Order 2024. The Applicant considers that further controls are secured by Requirement 8 (landscape and ecological management plan) and Requirement 7 (arboricultural method statement).</p>
7.4	<p>Applicant</p> <p>The Woodland Trust</p> <p>DCC</p> <p>SDDC</p>	<p><u>Ancient/ veteran trees</u></p> <p>The Woodland Trust [RR-316, REP1-049] question whether various trees in the Arboricultural Survey Report [APP-133] that are not identified as veteran/ ancient should be. The Applicant [REP1-023, REP3-031] provides its reasoning for each tree and says that it will engage with SDDC and DCC regarding the identification and classification of veteran trees .</p> <p>a) Please could the Applicant provide a draft copy of the SoCG with SDDC and DCC at Deadline 4, and set any tree classification matters yet to be agreed, and the next steps to be taken to address them?</p> <p>b) Please could The Woodland Trust, DCC and SDDC set out any remaining concerns regarding tree classification and ancient/ veteran trees at Deadlines 4 and 5, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</p>	<p>a) The Applicant has provided a full summary of the position reached with SDDC and DCC in respect of the SoCG in its Deadline 4 version of the Statements of Common Ground – Status Document [Doc 8.0]. The Applicant is continuing discussions with SDDC and DCC and will provide a further update on the status of the SoCG with those parties in early October 2024. The Applicant is seeking a meeting with SDDC and DCC regarding ecological and arboricultural matters and will as part of the work to progress the SoCG review any submissions by SDDC and DCC to this question.</p> <p>b) No response required.</p>
7.5	<p>Applicant</p> <p>DCC</p> <p>SDDC</p>	<p><u>Habitat Constraints Plan</u></p> <p>The ExA [PD-010 question 7.13] asked whether a Habitat Constraints Plan, or similar, would provide helpful clarification of the buffer zones, and if the Applicant, DCC and SDDC could agree what should be included in the Outline CEMP [REP1-007].</p> <p>DCC [REP1-026] and SDDC [REP1-029] recommended that a habitat constraints plan or similar is produced for the CEMP, which clearly defines buffer zones to sensitive features such as ancient/ veteran trees, other retained trees, ponds, watercourses, hedgerows and woodlands etc.</p>	<p>a) The Outline CEMP has been updated at Deadline 4 to include reference to a Habitats Constraint Plan, Section 2.8.5. This also sets out the scope of the Habitats Constraint Plan. Through the discharge of Requirement 9 (construction and environmental management plans), this will be approved by the local planning authority prior to construction of the Proposed Development.</p> <p>b) The Habitats Constraint Plan will be submitted with the full CEMP to discharge Requirement 9. The Applicant considers the site preparation works carved out of the definition for "commence" are not "so extensive that they would be likely to have significant environmental effects themselves"</p>

		<p>The Applicant <a href="#">[REP3-032]</a> agrees with SDDC and DCC that a Habitat Constraints Plan should be included as part of the detailed CEMP.</p> <p>a) Please could the Applicant, in consultation with SDDC and DCC, submit an updated Outline CEMP <a href="#">[REP1-007]</a> at Deadline 4 to include for a Habitat Constraints Plan, setting out what such a plan should include?</p> <p>b) Should a Habitats Constraint Plan be required for the site preparation works?</p> <p>c) Please could SDDC and DCC comment on the provisions for a Habitat Constraints Plan in the updated Outline CEMP at Deadline 5, set out any remaining concerns and suggest how their issues might be resolved?</p>	<p>as sub-paragraph (5) provides that the term “commence” is to include site clearance, and sub-paragraph (4) provides that no site preparation works are to be commenced until a soil management plan covering the site preparation works is submitted to and approved by the local planning authority.</p> <p>c) No response required.</p>
7.6	Applicant SDDC NE	<p><u>Skylark</u></p> <p>Paragraph 5.4.55 of NPS EN-1 states that consent should be refused where harm to a protected species and relevant habitat would result, unless there is an overriding public interest, and the other relevant legal tests are met.</p> <p>SDDC <a href="#">[REP1-029, REP2-001]</a> say that the supporting baseline for the Preliminary Environmental Information Report, identified 28 breeding territories for skylark within the Oakland Farm part of the Site and that this has dropped to an estimate of 19 pairs. It suggests that to remove a degree of uncertainty, it would be best to assume the maximum population estimate. SDDC questions the impact of the operation stage on the skylark population and the capacity of the surrounding area to accommodate the movement of any dispersed birds. It considers that there would be an adverse impact on ground nesting birds as while the total area of suitable habitat may have increased, the fragmented form of that habitat, broken up by solar panels, may no longer be suitable for some species.</p> <p>NE <a href="#">[REP1-037]</a> recommends that any potential negative effects to skylark should be identified as early as possible and designed out to avoid impacts. NE refers to its <a href="#">standing advice</a> on best practice for surveys, methods, and mitigation, to avoid negative impacts for breeding birds such as skylarks.</p> <p>The Applicant <a href="#">[REP1-025, REP3-032]</a> says that of the 28 territory holding males identified in the Study Area, only 19 were recorded within the Order Limits. It considers that the loss of potential nesting habitat would have a very minor effect on the local population of skylark within the Site and study area that would not be detrimental to the conservation status of the species in the area beyond the site.</p> <p>a) Is SDDC satisfied with the Applicant’s explanation of the number of breeding pairs?</p> <p>b) Please could the Applicant set out whether it has fully followed NE’s standing advice?</p> <p>c) With reference to NPS EN-1, do the Applicant, SDDC or NE consider that the Proposed Development would harm skylark or other ground nesting birds?</p> <p>d) Please could SDDC, DCC and NE set out any remaining concerns regarding skylark and other ground nesting birds, and suggest how their issues might be resolved?</p>	<p>a) No response required.</p> <p>b) The Applicant considers that it has fully followed NE’s standing advice. Bird surveys were undertaken by suitably experienced and qualified ecologists in accordance with both CIEEM and NE best practice guidance. Survey findings were used to fully assess the effect of the Proposed Development on skylark and this assessment is presented in the ES, together with appropriate mitigation measures. Given the reliance of this species on open habitat for nesting, the nature of the Proposed Development means it is not feasible to fully mitigation impacts. However, the provision of significant BNG within the Proposed Development, and subsequent management through the LEMP, is expected to provide better quality foraging resource for skylark.</p> <p>c) The ES at Page 55 of Chapter 6 <a href="#">[APP-135]</a> identified a residual minor effect to skylark. This is considered a precautionary assessment which assumes a reduction in nesting pairs but recognises the increase in foraging habitat for this species. The Proposed Development will provide significant enhancements for biodiversity and site management and monitoring is set out in the outline LEMP, which is secured by Requirement 8 (landscape and ecological management plan) of the dDCO. The Proposed Development comprises nationally significant low carbon infrastructure, for which NPS EN-1 has identified there is a critical national priority. Paragraph 4.2.6 of NPS EN-1 confirms that there is an overarching need case for this type of infrastructure, to which substantial weight should be given.</p> <p>d) No response required.</p>
7.7	Applicant SDDC NE	<p><u>Barn owl</u></p> <p>Paragraph 5.4.55 of NPS EN-1 states that consent should be refused where harm to a protected species and relevant habitat would result, unless there is an overriding public interest, and the other relevant legal tests are met.</p> <p>Breeding Bird Survey Report ES Appendix 6.4 <a href="#">[APP-124]</a> states that no records of barn owl were returned during the desk study or during a search of publicly available data sources, no records were found within the Site Boundary, and no suitable nest sites were</p>	<p>a) The Applicant considers that it has fully followed NE’s standing advice. Bird surveys were undertaken by suitably experienced and qualified ecologists in accordance with both CIEEM and NE best practice guidance. The effect of the Proposed Development on barn owl is presented at Chapter 6 of the ES <a href="#">[APP-135]</a> along with appropriate mitigation measures.</p> <p>The Proposed Development will provide significant enhancements for biodiversity and site management and monitoring is set out in the outline</p>

		<p>noted during the field survey. Breeding Bird Survey Report ES Appendix 6.9 [APP-128] records that a barn owl was recorded leaving a tree on 29/07/2021 within the Park Farm Site, adding that no specific survey was undertaken for this species, but it has been considered a probable breeding species on account of its presence and suitable nesting sites both within mature trees and within the Park Farm buildings.</p> <p>SDDC [REP1-029, REP2-001] say that the Applicant should clarify whether barn owl has been identified as nesting within a Site tree and if nesting has been identified, mitigation and compensation measures should be prescribed to adhere to statutory legislation and best practice guidelines during construction and operation stages. It refers to some inconsistencies in the Breeding Bird Survey Report . It considers that there would be an adverse impact on barn owl as while the total area of suitable habitat may have increased, the fragmented form of that habitat, broken up by solar panels, may no longer be suitable for some species.</p> <p>NE [REP1-037] recommends that any potential negative effects to barn owl should be identified as early as possible, designed out to avoid impacts. NE refers to its <a href="#">standing advice</a> on best practice for surveys, methods, and mitigation, to avoid negative impacts for breeding birds such as barn owl.</p> <p>The Applicant [REP1-025, REP3-032] states that the site provides suitable habitat for barn owl to nest but no nesting activity was recorded during the bird surveys. It considers that the Proposed Development would not result in a reduction in the availability of foraging habitat during either construction or operation stages.</p> <p>a) Please could the Applicant set out whether it has fully followed NE’s standing advice?</p> <p>b) Please could the Applicant address the inconsistencies in the ES and submit an update to the ES at Deadline 4, together with any necessary updates to the Outline CEMP [REP1-007], ensuring that it takes a precautionary approach?</p> <p>c) Please could SDDC and DCC comment on the updates at Deadline 5?</p> <p>d) With reference to NPS EN-1, please, at Deadlines 4 and 5, could the Applicant, SDDC and NE set out whether they consider that the Proposed Development would harm barn owl?</p> <p>e) Please, at Deadlines 4 and 5, could SDDC, DCC and NE set out any remaining concerns regarding barn owl, and suggest how their issues might be resolved?</p>	<p>LEMP, which is secured by Requirement 8 (landscape and ecological management plan) of the dDCO. .</p> <p>b) The Applicant confirms that there are no inconsistencies within the ES. The survey reported in Technical Appendix 6.4 related to Oaklands Farm plus a 2km buffer and did not identify any records of barn owl through either desk study or field survey.</p> <p>The survey reported in Technical Appendix 6.9 also included Park Farm, and reports on a barn owl was recorded during bat surveys at Park Farm.</p> <p>The information therefore relates to different areas of the Proposed development site rather than it being an inconsistency in findings.</p> <p>The Outline CEMP will be updated has been updated at Deadline 4 to detail additional specific precautions in relation to barn owl (Section 2.8.6) to ensure a precautionary approach has been taken. This will include:</p> <ul style="list-style-type: none"> <li>• The provision of new nesting boxes in suitable locations away from construction areas;</li> <li>• Pre-construction checks of potential nesting features prior to works;</li> <li>• Sensitive timing of works and implementation of appropriate working buffers to avoid disturbance during nesting; and</li> <li>• Retention and protection of field margin habitats which provide suitable hunting habitat.</li> </ul> <p>c) No response required.</p> <p>d) The Applicant does not consider that the Proposed Development would result in significant adverse effects to barn owl and will provide overall benefit for this species through increasing the extent and quality of habitats present. Any potential impacts associated with noise and vibration disturbances would be successfully avoided through the measures outlined above, as secured through the Requirements in the dDCO. The habitats directly affected by the Proposed Development are of low to negligible suitability (e.g. arable crop) for hunting barn owl, and therefore, no loss of habitat is predicted during either the construction or operation phase. The Proposed Development comprises nationally significant low carbon infrastructure, for which NPS EN-1 has identified there is a critical national priority. Paragraph 4.2.6 of NPS EN-1 confirms that there is an overarching need case for this type of infrastructure, to which substantial weight should be given. Paragraph 4.2.15 states that residual non-HRA impacts are unlikely to outweigh the urgent need for this type of infrastructure.</p> <p>The operation phase will see the additional of new nesting boxes, together with a significant increase in the extent of rough grassland habitat which barn owl requires for hunting and is therefore expected to enhance the Site for barn owl.</p> <p>(e) No response required.</p>
7.8	Applicant	<u>Great crested newt</u>	

	SDDC	<p>Paragraph 5.4.55 of NPS EN-1 states that consent should be refused where harm to a protected species and relevant habitat would result, unless there is an overriding public interest, and the other relevant legal tests are met.</p> <p>SDDC [REP1-029, REP2-001] is not content that great crested newt was scoped out of the detailed assessment, that great crested newt has not been fully surveyed and that this should be addressed. It considers that there are a total of 15 off-site ponds within 250m of the site boundary, which have not been surveyed as no access was obtained from the landholders, therefore, presence or absence of great crested newt in these ponds has not been fully determined. It considers that additional compensation and mitigation measures may be required to control the potential for killing and injuring great crested newt during the construction stage and sets out what could be included in a Great Crested Newt Mitigation Strategy.</p> <p>The Applicant [REP1-025, REP3-032] states that the findings of the great crested newt surveys indicate that great crested newt are likely to be absent from the Site. Nine surveys were carried out of waterbodies located within and close to the Site boundary which had suitability for supporting great crested newt confirmed an absence of great crested newt. Of the 15 offsite waterbodies identified by SDDC, 12 are located over 100m from the Site boundary, reducing the likelihood of any great crested newt (if present) travelling from these waterbodies into the largely unsuitable habitats present within the Site boundary. It considers that great crested newt are highly unlikely to be affected by the Proposed Development and therefore, no mitigation is required for great crested newt other than the application of standard avoidance measures as part of a highly precautionary approach secured through Requirement 9 (construction environmental management plans) and Requirement 21 (protected species) of the dDCO [REP3-008].</p> <p>a) Please could the Applicant comment on the potential for offsite waterbodies identified by SDDC that fall within 100m of the Site boundary to support great crested newt?</p> <p>b) As a precautionary measure, please could the Applicant update the Outline CEMP [REP1-007] to include for a Great Crested Newt Mitigation Strategy and set out the contents required of it?</p> <p>c) With reference to NPS EN-1, do the Applicant or SDDC consider that the Proposed Development would harm great crested newt?</p> <p>d) Please could SDDC set out any remaining concerns regarding great crested newt, and suggest how their issues might be resolved?</p>	<p>a) The potential for the three offsite waterbodies located within 100m of the Site boundary to support GCN is considered very low and can be successfully mitigated through the application of specific measures which are detailed and which would be implemented through the CEMP (as per the response below to b)).</p> <p>b) The Outline CEMP has been updated at Deadline 4 to detail additional specific precautions in relation to GCN (Section 2.8.7). This will include:</p> <ul style="list-style-type: none"> <li>• Appropriate working measures, including storage of soil and use of TAF fencing around any open excavations to prevent trapping of GCN in the highly unlikely event of transitory individuals passing through the Site; and</li> <li>• Use of tool box talks and ECoW to ensure that suitable protocols are in place and can be implemented in the unlikely event that GCN is discovered during works (e.g. safe relocation to a suitable location).</li> </ul> <p>c) The Applicant considers that the risk to GCN is negligible on the basis that the waterbodies of highest suitability within the Site were sampled and recorded negative eDNA tests. Furthermore, the habitats affected are not suitable for supporting breeding of sheltering GCN. The very low risk therefore relates to the potential for transitory individuals associated with offsite waterbodies to move into the Site during the construction phase. This risk can be successfully mitigated through the application of specific measures which are detailed within the CEMP, which is secured through Requirement 9 of the dDCO. The Proposed Development comprises nationally significant low carbon infrastructure, for which NPS EN-1 has identified there is a critical national priority. Paragraph 4.2.6 of NPS EN-1 confirms that there is an overarching need case for this type of infrastructure, to which substantial weight should be given. Paragraph 4.2.15 states that residual non-HRA impacts are unlikely to outweigh the urgent need for this type of infrastructure.</p> <p>d) No response required.</p>
7.9	Applicant SDDC	<p><u>Otter</u></p> <p>Paragraph 5.4.55 of NPS EN-1 states that consent should be refused where harm to a protected species and relevant habitat would result, unless there is an overriding public interest, and the other relevant legal tests are met.</p> <p>SDDC [REP1-029, REP2-001] provides evidence of the presence of otter on the watercourses connected with the Proposed Development and the potential for adverse impacts on them, including cumulatively with a proposed Energy Storage System at Fairfields Farm. It considers that further clarification on the importance of the Site for otter is required and what mitigation measures are in place, particularly regarding site works and water crossings in relation to otter disturbance given that both applications are likely to be aligned. SDDC say that the Outline OEMP [REP1-009] does not appear to show any mitigation for otter.</p> <p>The Applicant [REP3-031, REP3-032, REP3-033] concludes that it is likely that otter uses the unnamed watercourse and ponds for foraging and shelter and considers that</p>	<p>a) Impacts to otter are considered unlikely in the absence of avoidance and mitigation measures. When mitigation and avoidance measures (see below) are applied, impacts to otter can be avoided entirely, and therefore there is no mechanism by which cumulative impacts with the proposed Energy Storage System at Fairfields Farm could occur.</p> <p>b) The Outline CEMP has been updated at Deadline 4 to detail additional specific precautions in relation to otter (Paragraph 2.8.8). This includes:</p> <ul style="list-style-type: none"> <li>• Pre-construction surveys to identify otter shelters or recent signs of presence.</li> <li>• If signs of otter are identified during pre-construction surveys, there will be sensitive timing of works and implementation of appropriate working buffers to avoid disturbance.</li> <li>• Fencing to protect otter habitat from encroachment and disturbance.</li> <li>• Retention and protection of riparian habitats.</li> </ul>

		<p>embedded mitigation and the mitigation measures for protected species, including otter, would ensure that significant impacts on otter are avoided. The Applicant refers to mitigation measures within the Outline LEMP [REP3-025], Outline CEMP [REP1-007], Outline DEMP [REP1-011], ES Chapter 6 [APP-135] and the Schedule of Mitigation [APP-179].</p> <p>a) Please could the Applicant set out its consideration of impacts on otter cumulatively with the proposed Energy Storage System at Fairfield's Farm?</p> <p>b) Please could the Applicant ensure that the mitigation for otter is clearly identified in the outline management and mitigation plans and that all mitigation for otters in ES Chapter 6 [APP-135] and the Schedule of Mitigation [APP-179] is secured in the outline management and mitigation plans?</p> <p>c) With reference to NPS EN-1, do the Applicant or SDDC consider that the Proposed Development would harm otter?</p> <p>d) Please could SDDC set out any remaining concerns regarding otter, and suggest how their issues might be resolved?</p>	<ul style="list-style-type: none"> <li>• Use of an ECoW, tool box talks and emergency protocol in the highly unlikely event of an otter being encountered during works.</li> <li>• Best practice construction measures, including pollution prevention and safe storage of material.</li> </ul> <p>c) The Applicant does not consider that the Proposed Development would result in significant adverse effect to otter as any potential impacts associated with disturbance or damage of habitat could be successfully avoided through the measures outlined above, as secured through the Requirements in the dDCO. The riparian habitats directly affected by the proposals are highly localised and construction in these locations will be temporary and short in duration and will follow best practice working methods. The efficacy of these measures should be regarded in the context of the nature of this highly mobile species. Indeed, the discrete riparian habitats within the Site are likely to represent a very small proportion of an individual otter's territory, with territories often extending across several miles of watercourse as a minimum. The Proposed Development comprises nationally significant low carbon infrastructure, for which NPS EN-1 has identified there is a critical national priority. Paragraph 4.2.6 of NPS EN-1 confirms that there is an overarching need case for this type of infrastructure, to which substantial weight should be given. Paragraph 4.2.15 states that residual non-HRA impacts are unlikely to outweigh the urgent need for this type of infrastructure.</p> <p>d) No response required.</p>
7.10	Applicant NE DCC SDDC	<p><u>Badger</u></p> <p>NE [AS-022, REP1-037] are aware that the Proposed Development may impact a Badger sett and say that it may be possible to avoid impacts through the development of the final design. It is unable to issue Letters of No Impediment before it has received draft protected species licence applications for review.</p> <p>The Applicant [REP3-029] say that it will submit a draft application for a Badger Licence to NE shortly after Deadline 3, in order to seek a Letter of No Impediment from NE on that matter.</p> <p>DCC [REP1-026] state that consideration should be given to the ground level fencing design to enable the passage of badger and consider that badger setts should be given greater consideration in respect of buffer zones to minimise disturbance.</p> <p>Paragraph 4.49 of the Outline LEMP [REP3-025] includes that indicative locations of the mammal gaps are detailed within ES Figure 6.3, would allow the movement of badger and hedgehog to disperse through the Site, and that the gaps would be 20-30cm in size.</p> <p>a) Has the Applicant submitted a draft application for a Badger Licence to NE?</p> <p>b) Does NE have any concerns that would prevent it from issuing a Letter of No Impediment. How might any such concerns be resolved?</p> <p>c) Please could a Letter of No Impediment, or confirmation that one cannot be provided, be submitted by Deadline 4 or 5?</p> <p>d) Please, following consultation with DCC, could the Applicant respond to DCC's concerns about buffer distances for badger?</p>	<p>a) The Applicant submitted a draft Licence application to NE on the 10 September 2024. The Applicant met with NE on the 27 September 2024 to discuss that draft Licence application and NE indicated that they would be in a position to issue a Letter of No Impediment (LoNI) no later than the 15 November 2024. The Applicant will provide an update on the draft Licence Application at Deadline 5, but based on the timescales indicated by NE expects to be able to submit a LoNI at Deadline 6.</p> <p>b) No response required.</p> <p>c) As stated in response to ExQ 7.10(a) above, NE has informed the Applicant that it will be in a position to issue a LoNI no later than 15 November 2024. The Applicant intends to submit the LoNI at Deadline 5.</p> <p>d) The Applicant's position is that the mammal gaps proposed through the Outline LEMP would be sufficient to allow for the movement of badgers through and around the Proposed Development. The Applicant is continuing to discuss ecological matters with SDDC and DCC and will provide an update on that position in early October 2024.</p> <p>e) No response required.</p>



		e) Please could DCC and SDDC set out any remaining concerns regarding badger, and suggest how their issues might be resolved?	
7.11	Applicant DCC SDDC	<p><u>Draft DCO [REP3-008] Requirement 21 – Protected Species</u></p> <p><u>Species Protection Plans</u></p> <p>SDDC [REP1-029] consider that the Outline CEMP [REP1-007] should provide Species Protection Plans for Otter, Great Crested Newt/ /Ponds, Hedgerows &amp; Trees and Woodland and identify important zones for each species to feed into mitigation strategies. DCC [REP1-026] suggest that outline Species Protection Plans. should be provided in outline during the Examination.</p> <p>The Applicant has updated paragraph 2.81 of the Outline CEMP [REP1-007] to set out the high level contents for a Species Protection Plan to be included in the final CEMP.</p> <p>The ExA notes the series of concerns raised by SDDC [REP1-029, REP2-001] in relation to scoping, surveys and potential impacts on a number of protected species, including skylark, barn owl, great crested newt, and otter.</p> <p>a) Please could the Applicant, in consultation with SDDC and DCC, submit an updated Outline CEMP [REP1-007] at Deadline 4 to include more detail of Species Protection Plans so that specific measures are identified for individual species and address SDDC’s concerns?</p> <p>b) Site preparation works which include (amongst other things) remedial work in respect of any contamination or other adverse ground conditions, diversion and laying of services, and the demolition of existing buildings and structures, typically fall outside the Outline CEMP [REP1-007]. Should Species Protection Plans be required for the site preparation works?</p> <p>c) Please could SDDC and DCC comment on the provisions for Species Protection Plans in the updated Outline CEMP at Deadline 5, set out any remaining concerns and suggest how their issues might be resolved?</p>	<p>a) The Outline CEMP has been updated at Deadline 4 to include more detail on specific protection measures for various species:</p> <ul style="list-style-type: none"> <li>• Paragraph 2.8.6 – Barn owl;</li> <li>• Paragraph 2.8.7 – Great Crested Newt (GCN);</li> <li>• Paragraph 2.8.8 – Otter.</li> </ul> <p>Further mitigation for hedgerows, trees, woodland etc is included in Section 2.8 of the Outline CEMP. The Applicant’s commitment to providing a Habitats Constraint Plan has been added to the Outline CEMP (Paragraph 2.8.5). The delivery of the CEMP, and the Habitats Constraint Plan, is secured by Requirement 9 (construction environmental management plans). As detailed in its Status of Statements of Common Ground document at Deadline 4 [Doc 8.0] the Applicant is arranging a meeting with the local planning authorities to discuss ecological matters and will be using that to discuss the measures to be used to protect specific species and ecological features. The Applicant will endeavour to provide an update to the ExA ahead of the issuing of the agenda for the Issue Specific Hearings to be held in October 2024.</p> <p>b) The Applicant does not consider it necessary for Species Protection Plans to be required for the site preparation works that fall outside the scope of the CEMP secured by Requirement 9 of the dDCO. Requirement 9 secures the delivery of Species Protection Plans for the relevant phase of the authorised development. The Applicant considers the site preparation works carved out of the definition for “commence”, that is those not comprising of site clearance, are not “so extensive that they would be likely to have significant environmental effects themselves”.</p> <p>c) No response required.</p>
7.12	EA SDDC	<p><u>Invasive non-native species</u></p> <p>Do EA or SDDC have any concerns regarding non-native species that need to be addressed at this stage? How might their concerns be resolved?</p>	The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.

<b>8. Historic environment</b>			
8.1	Historic England DCC Applicant	<p><u>Potential harm to designated heritage assets</u></p> <p>Historic England [AS-021] and DCC [REP2-001] comment on the potential harm to designated heritage assets. DCC suggest magnitudes of harm, whereas Historic England don’t.</p> <p>a) Does Historic England have any comments on the magnitude of harm to the heritage assets that it mentions?</p> <p>Historic England mention some assets that DCC does not comment on, including:</p> <ul style="list-style-type: none"> <li>• Church of St Giles and Cauldwell Hall, Caldwell;</li> </ul>	<p>a) No response required.</p> <p>b) With the exception of the buildings at the former Drakelow Hall’s southern entrance, the assets referred to in part (a) of ExQ 8.1 were assessed as not susceptible to effects from the Proposed Development and, consequently, would experience no harm. As the assets were not susceptible to effects, detail on them is presented in ES Appendix 7.1: Historic Environment Assessment (Document Ref: EN010122/D1/6.1/Chp 7/ Appx 7.1) rather than the ES chapter.</p>

		<ul style="list-style-type: none"> <li>• Catton Hall at Coton in the Elms;</li> <li>• Grade II listed buildings in Walton-on-Trent, Caldwell, Rosliston, Coton in the Elms; and</li> <li>• buildings related to the former Drakelow Hall.</li> </ul> <p>b) Please could DCC and the Applicant comment on the magnitude of harm to those assets?</p> <p>The Applicant <a href="#">[REP3-033]</a> says that it is engaging with Historic England, including to progress a SoCG, and suggest that Historic England have indicated that the Proposed Development would create a level of harm at the lower end of less than substantial.</p> <p>c) Please could the Applicant provide a draft copy of the SoCG with Historic England at Deadline 4, set out the matters yet to be agreed with Historic England including any in relation to the potential harm to designated heritage assets, and the next steps to be taken to address them?</p>	<p>The Church of St Giles (List Entry No. 1334611) and Cauldwell Hall (List Entry No. 1334612) lie adjacent to one another in the hamlet of Caldwell, c.1.3 km east of the Site. For both assets see ES Appendix 7.1: para. 3.41 (p.25) for description of the assets and Appendix B p. B-25 for appraisal of the setting of these assets and their relationship to the Site and Proposed Development.</p> <p>Catton Hall (List Entry No. 1334609) lies immediately east of the River Trent, c. 2 km southwest of the Site. See ES Appendix 7.1: p.28 for description of the asset and Appendix B p. B-25 for appraisal of the setting of this asset and their relationship to the Site and Proposed Development.</p> <p>For a description of the Grade II listed buildings at Walton-on-Trent, appraisal of their significance and role of setting, see Appendix 7.1, paragraphs 4.34 – 4.37 (p.42-44). The statement at paragraph 4.37 that the setting of buildings within the village is discrete applies to those listed buildings not mentioned by name in the text (i.e. listed buildings at Walton-on-Trent other than St. Laurence and those at Walton Hall). The setting of these Grade II listed buildings being confined within the village means that the Proposed Development would have no effects upon their significance or how that is appreciated (see Appendix 7.1, Appendix B for building-by-building appraisal).</p> <p>For a description of the Grade II listed buildings at Caldwell, appraisal of their significance and role of setting, see Appendix 7.1: paragraph 3.41 (p.25) and Appendix B for building-by-building appraisal of the setting of these assets and their relationship to the Site and Proposed Development.</p> <p>For the Grade II listed buildings at Rosliston an appraisal of their significance and setting is set out in Appendix 7.1: Appendix B, which provides a building-by-building appraisal of the setting of these assets and their relationship to the Site and Proposed Development.</p> <p>For a description of the Grade II listed buildings at Coton in the Elms, appraisal of their significance and role of setting, see Appendix 7.1: paragraph 3.40 (p.24-5) and Appendix B for a building-by-building appraisal of the setting of these assets and their relationship to the Site and Proposed Development.</p> <p>For an overview and description of the listed buildings relating to the former Drakelow Hall, see Appendix 7.1: paragraph 3.49 (p.29). A detailed description of significance of the southern park entrance structures is presented at paragraph 4.30 – 4.33 (p.41-2) with assessment presented at paragraphs 4.69-4.70 (p.60-61). This assessment concludes that the Proposed Development will have no effects and, hence, cause no harm to either the entrance gate listed building or the non-designated lodge. Appendix 7.1: Appendix B presents an appraisal of the setting of the other listed buildings related to the former Drakelow Hall and their relationship to the Site and Proposed Development (see p. B-15 and B-25).</p> <p>c) The Applicant has provided a signed copy of the SoCG with Historic England at Deadline 4.</p>
8.2	DCC	<u>Archaeology – potential harm to assets subject to the policies for designated heritage assets</u>	The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.

		<p>Paragraph 5.9.21 of NPS EN-1 states that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets. Paragraph 5.9.31 says that where there would be substantial harm to (or total loss of significance of) a designated heritage asset then consent should be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss, or various conditions apply.</p> <p>DCC [REP1-026, REP2-001] says that there are no recorded Roman assets within the site, there have been late Mesolithic and early neolithic finds and further assets cannot be ruled out, and there is a potential for medieval features. It considers that the lack of information on archaeological assets is likely to reflect a lack of sustained investigation rather than an absence of archaeology. DCC considers that the works could potentially result in total loss or substantial harm to significance.</p> <p>The Applicant [REP1-025, REP3-033] says that following analysis of the geophysical survey results which suggests extensive disturbance of the Site in the past, it considers that assets of later prehistoric to Roman date of demonstrably equivalent value to designated heritage assets are unlikely to be present and there would not be any harm due to the controls in place through the Outline CEMP [REP1-007] and Written Scheme of Investigation secured by Requirement 18 of the dDCO [REP3-008].</p> <ul style="list-style-type: none"> <li>a) Please could DCC comment on the likelihood of any archaeology of demonstrably equivalent value to Scheduled Monuments being present within the site?</li> <li>b) Does DCC consider it likely that the Outline CEMP [REP1-007] and Written Scheme of Investigation secured by Requirement 18 of the dDCO [REP3-008] would avoid harm to archaeology and, if not, is the potential harm likely to amount to substantial harm, total loss, or less than substantial harm to its significance?</li> </ul>	
8.3	Applicant	<p><u>Archaeology – micrositing</u></p> <p>Paragraph 2.10.137 of NPS EN-1 states that the ability of the Applicant to microsite specific elements during the construction phase should be an important consideration by the SoS when assessing the risk of damage to archaeology.</p> <p>DCC [REP1-026] consider that use of micrositing to enable the avoidance of harm to archaeological assets identified during commencement and construction stages may be crucial to the protection of previously unrecorded assets.</p> <p>The Outline CEMP [REP1-007] includes that the Applicant would be able to microsite certain elements of the Proposed Development (such as transformer stations, fencing and access tracks), but in situations where micro-siting would not wholly avoid or alleviate impacts to archaeological discoveries on site, the Applicant would use alternative construction methods to protect archaeological assets, where required. Alternative methods are set out for the solar panel support structures.</p> <ul style="list-style-type: none"> <li>a) Please could the Applicant set out the potential for micro-siting other elements of the Proposed Development including, but not limited to, the onsite substation and BESS?</li> <li>b) If micrositing is not possible then what “alternative construction methods” could be used to protect any archaeological assets, including any that might be subject to the policies for designated heritage assets?</li> <li>c) With reference to paragraph 2.10.137 of NPS EN-1, please could the Applicant update the Outline CEMP [REP1-007] to include a firm commitment (avoiding terms such as “will be able to”) in relation to micrositing where there might be a risk of damage to archaeology, including:</li> </ul>	<ul style="list-style-type: none"> <li>a) The Applicant requires the ability to microsite infrastructure within the Design Parameters set out in Table 4.2 in ES Chapter 4, subject to no materially new or materially more adverse environmental effects to those identified in the environmental statement arising.</li> </ul> <p>Micro-siting would not be used if buried archaeological assets do not warrant preservation in situ. An agreement with the DCC Archaeologist would be reached as to which assets do not warrant preservation in situ and appropriate fieldwork to address these assets and provide for their preservation by record would be included in a revised mitigation strategy.</p> <p>Micro-siting will most likely apply to the following key components of the Proposed Development (as listed in Chapter 4 of the ES): solar PV arrays (including panels; mounting structures; transformers); laying of electrical cables; vehicular access; internal access roads; fencing and security; landscaping including habitat creation areas; drainage; and the creation of a new permissive path.</p> <p>However, large elements such as the on-site substation (including permanent compound and welfare) and Battery Energy Storage System (BESS) compounds are more fixed and have more limited potential for micro-siting due to the size of these elements and the on-site constraints / considerations.</p> <p>However, for the on-site substation and BESS compounds, flexibility is built into the Design Parameters set out in Table 4.2 of ES Chapter 4 to configure</p>

		<ul style="list-style-type: none"> <li>• identifying which elements of the Proposed Development micrositing would be used for;</li> <li>• identifying which elements it would not be used for; and</li> <li>• justifying why micrositing may not be used?</li> </ul>	<p>elements in different orientations and layouts, or to consolidate design elements into single components instead of a greater number of smaller components, which may reduce the footprint and could offer a degree of micro-siting to protect archaeological assets if required.</p> <p>b) If micro-siting is warranted (e.g., buried archaeological assets require preservation in situ, as agreed with DCC Archaeology) and not possible (e.g., due to ground conditions), alternative construction methods will be utilised to protect any archaeological assets.</p> <p>Alternative construction methods would entail reduced foundation depths or no-dig foundation systems. A staged review of harm avoidance methods would be undertaken for any buried archaeological assets of equivalent significance to designated heritage assets which lie within the construction footprint. This process would work as follows:</p> <ul style="list-style-type: none"> <li>i. Use micrositing to avoid asset: if micrositing does not allow avoidance and sufficient standoff from the asset then;</li> <li>ii. Redesign layout to avoid asset: if redesign not possible then;</li> <li>iii. Adoption of a no-dig foundation solution that would avoid the asset and not cause any compaction to it.</li> </ul> <p>The ability to micro-site and the use of alternative construction methods for solar panel support is detailed in Paragraphs 2.9.8 – 2.9.10 of the Outline CEMP.</p> <p>c) Paragraphs 2.9.8 – 2.9.12 of the Outline CEMP include details on micro-siting in relation to archaeology. In direct response to the ExA’s questions:</p> <ul style="list-style-type: none"> <li>• Elements micro-siting could be used for – All infrastructure has the potential to be micro-sited (if required) subject to the Design Parameters set out in Table 4.2 in ES Chapter 4, and subject to no materially new or materially more adverse environmental effects than those identified in the environmental statement, including on archaeology. Micrositing will most likely apply to the following key components of the Proposed Development (as listed in Chapter 4 of the ES): solar PV arrays (including panels; mounting structures; transformers); laying of electrical cables; vehicular access; internal access roads; fencing and security; landscaping including habitat creation areas; drainage; and the creation of a new permissive path</li> <li>• Elements micro-siting would not be used for – It is unlikely that micrositing will be utilised / possible for larger infrastructure such as on-site substation and BESS compound(although as set out above, it may be possible to configure elements in different orientations and layouts, or to consolidate design elements into single, larger components instead of a greater number of smaller components (within the design parameters outlined in Table 4.2 of ES Chapter 4), which may reduce the footprint and could offer a degree of micro-siting</li> </ul>
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			<ul style="list-style-type: none"> <li>Justify why micro-siting may not be used - Micro-siting would not be used if buried archaeological assets do not warrant preservation in situ. An agreement with the DCC Archaeologist would be reached as to which assets do not warrant preservation in situ and appropriate fieldwork to address these assets and provide for their preservation by record would be included in a revised mitigation strategy.</li> </ul> <p>In some circumstances, micro-siting may be warranted but not possible, for example due to ground conditions and/or the size of the relevant element of the proposed development. As set out above, where the Applicant is unable to avoid the asset through redesign, a no-dig foundation solution would be adopted, which would avoid the asset and not cause any compaction to it.</p>
8.4	DCC Applicant	<p><u>Draft DCO [REP3-008] Requirement 18 – Archaeology</u></p> <p>This requirement does not apply to the site preparation works, which are excluded from the definition of “commence”. Site preparation works include (amongst other things) intrusive archaeological surveys, remedial work in respect of any contamination or other adverse ground conditions, diversion and laying of services, and the demolition of existing buildings and structures.</p> <p>The Applicant [REP1-025, REP3-032] considers that it is not necessary for the Requirement to apply to the site preparation works and suggests that the site preparation works might be required to inform the Written Scheme of Investigation.</p> <p>The ExA is concerned that some of the site preparation works may have the potential to harm archaeology, including any that might be subject to the policies for designated heritage assets, for which Requirement 18 provides key mitigation. On that basis the ExA is considering whether Requirement 18 should apply to the site preparation works.</p> <p>a) Please could DCC comment?</p> <p>b) Please could the Applicant comment and suggest wording for Requirement 18 to apply to the site preparation works in case the ExA wishes to include it?</p>	<p>(a) No response required.</p> <p>(b) The Applicant proposes Requirement 18(1) is updated as follows:</p> <p>“No phase within the authorised development, <u>and no part of the site preparation works for that phase requiring archaeological works</u>, is to be commenced until a written scheme for the investigation of areas of archaeological interest within that phase has been submitted to and approved by the local planning authority in consultation with the county archaeologist.”</p>

9. Landscape, visual, glint, and glare			
9.1	Diane Abbott Applicant SDDC	<p><u>Visualisations</u></p> <p>Diane Abbott [REP1-043] has submitted sample images which compare some of the Applicant’s views with her own photos and measurements. She suggests that the Applicant’s visualisations do not seem to be accurately calibrated and misrepresent the actual effects. Diane Abbott recommends that the Applicant’s visualisations are correctly calibrated, that revised images are provided that offer a better degree of accuracy, and that the assessment is revisited accordingly.</p> <p>It appears to the ExA that there are typos in Diane Abbott’ references [REP1-043] to the Applicant’s figures [APP109, APP-110] and that her reference to Figure 5.11c should read Figure 5.10c, and that Figure 5.10gc should read Figure 5.10g.</p> <p>The Applicant [REP3-031] says that the details raised with regard to the viewpoints and visualisations are largely a function of perspective, but also due to the limitations of the digital terrain data used to create visualisations, which provide a proxy for exact ground</p>	<p>a) No response required.</p> <p>b) The Applicant is provided the details of the calibration in a separate response which is being finalised and will be submitted immediately following Deadline 4.</p> <p>c) The Applicant considers that its visualisations are accurate to the required standard for Landscape and Visual Impact Assessment. Justification for this opinion for each of the stated figures is provided in the separate response mentioned above, which will be provided immediately after Deadline 4.</p> <p>d) Whilst all visualisations will have the same potential for variation in height based on the terrain data used, the impact of this variation is significantly reduced with each viewpoint as they increase in distance from the site, and</p>

		<p>levels, but have a slight variation from what is 'true' to the actual landscape. It says that it complies with Landscape Institute guidance, including the 3rd Edition of the Guidelines on Landscape and Visual Impact Assessment (GLVIA3) (2013). It states that the visualisations are a tool used to help understand the nature of the effects and the slight variations to ground level are normal limitations of the process and do not change the resulting assessment of effects.</p> <p>Paragraph 3.23 of GLVIA3 identifies that it is important that the basis of professional judgements is transparent and understandable, so that the underlying assumptions and reasoning can be understood by others. Paragraph 8.15 states that "<i>Photographs can have an important role to play in communicating information about the landscape and visual effects of a proposed development, although it is acknowledged that they cannot convey exactly the way that the effects would appear on site</i>". Paragraph 8.16 says that "<i>The predicted changes must be described in the text but should also be illustrated by means of visualisations showing, from representative viewpoints, how the changes in views will appear</i>".</p> <p>The ExA is considering the potential for misleading inaccuracies in the Applicant's visualisations and any implications of that for its consideration of the landscape and visual impact assessment.</p> <p>a) Does Diane Abbott agree with the ExA's interpretation of typos in her references to the Applicant's figures?</p> <p>b) Please could the Applicant set out the calibration undertaken of the digital terrain model to actual ground levels?</p> <p>c) Please could the Applicant provide a detailed response to the comments made by Diane Abbott [REP1-043] on Figures 10c, 10f, 10g, 10j, 10k, 10o and 10p [APP109] (Viewpoint 1: Coton Road), and Figure 11c [APP-110] (Viewpoint 2: Cross Britain Way), in each case setting out how accurate it considers that its own visualisations are, with reasoning?</p> <p>d) Please could the Applicant comment on the potential for inaccuracies in the other visualisations used for the landscape and visual assessment?</p> <p>e) Please could SDDC comment?</p>	<p>when viewed within the visualisation documents would be unlikely to be noticeable at all. Viewpoints 1 and 2 are within the site and will be subject to the most change between datasets.</p> <p>e) No response required.</p>
9.2	Applicant	<p><u>Operation stage mitigation</u></p> <p>The Applicant [REP1-025 Appendix C] provides a detailed justification for why the effects at various locations queried by the ExA [PD-010 question 9.2] would reduce from Year 1 to Year 10 and sets out the specific mitigation measures necessary to achieve that.</p> <p>For clarity, and to assist with the later production of detailed management and mitigation plans, please could the Applicant add its full response to an update of ES Chapter 5 [REP1-013]?</p>	<p>The Applicant has added its full response at paragraphs 5.146, 5.152 to 5.154, 5.171 to 5.173, 5.182 to 5.183, 5.186 to 5.188 and 5.194 to 5.195 of ES Chapter 5 [Deadline 4 Document Reference 6.1].</p>
9.3	SDDC The National Forest Company	<p><u>The National Forest</u></p> <p>SDDC [REP1-029] considers that the Proposed Development is consistent with Local Plan Policy INF8 in relation to tree planting and connectivity depending on the amount and extent of necessary tree felling for the safe delivery of the Proposed Development. It requests greater identification of areas that would be subject to tree felling to help identify whether the mitigation measures are adequate.</p> <p>The Applicant [REP3-030, REP3-032] says that the Arboricultural Survey Report [APP-133] includes a Tree Removal and Retention Plan that identifies where trees would be removed, and anticipates providing an update at Deadline 4.</p>	<p>a) The Applicant has submitted an updated Arboricultural Survey Report [6.1 – ES Appendix 6.14] at Deadline 4 which corrects the figures stated in respect of hedgerow removal, as discrepancies had been identified with those.</p> <p>The Applicant is continuing to work to update the Arboricultural Survey Report to provide further detail on the approach to be taken to the construction of the access and cable route at Drakelow and now anticipates providing a further updated Arboricultural Survey Report at Deadline 5. The Applicant will endeavour to engage with SDDC regarding the amended report ahead of Deadline 5.</p>

		<p>a) Please could SDDC comment on the updated Arboricultural Survey Report at Deadline 5 in relation to its concerns regarding compliance with Local Plan Policy INF8, set out any remaining concerns regarding compliance with Local Plan Policy INF8, and suggest how the issues might be resolved?</p> <p>b) Does The National Forest Company have any remaining concerns? How might they be addressed?</p>	b) No response required.
9.4	Applicant SDDC	<p><u>Glint and glare assessment modelling</u></p> <p>In the context of the above questions on the accuracy of the visualisations used for the landscape and visual assessment, please could the Applicant comment on the accuracy of the digital terrain and solar panel models used in the glint and glare assessment?</p> <p>Does SDDC have any related concerns? How might they be addressed?</p>	Based on Pager Power's experience of over 1,400 glint and glare assessments, small changes to the actual terrain height compared to the assessed digital terrain model do not significantly change the glint and glare modelling results. The Applicant's position is therefore that the digital terrain model provides an accurate assessment of the expected glint and glare effects.
9.5	Applicant	<p><u>Glint and glare - horse riders, agricultural vehicles and lorries</u></p> <p>Councillor Amy Wheelton [REP1-039] questions whether the assessment considers horse riders, agricultural vehicles and lorries that sit higher on the road than car users.</p> <p>Diane Abbott [REP1-043] suggests that impacts on horse-riders are not analysed. She says that road users are assessed at a height of 1.5m above ground level and considers that this does not come near to the height of horse riders, or drivers of farm equipment, vans, trucks, or HGV. She questions whether the screening would be effective for drivers of tall vehicles.</p> <p>The Applicant [REP3-031] says that it is not aware of any potential for glint and glare to occur which would give rise to issues in relation to the safety of different road users. The Applicant has updated paragraphs 5.43 and 5.44 of the Outline LEMP [REP3-025] to provide for screening for glint and glare effects would be maintained to at least 3m in height.</p> <p>Please could the Applicant clarify its assessment of potential glint and glare effects on horse riders, agricultural vehicles, and lorries, and how it has accounted for any differences in level compared with car users or pedestrians?</p>	<p>It is Pager Power's methodology, in accordance with industry standards, to consider elevated road users in more detail on dual carriageways and motorways due to the typically higher densities of elevated drivers compared to other types of roads.</p> <p>As the assessed roads in the study area are not dual carriageways or motorways, the assessment has only considered the potential impact on general road users.</p> <p>The Local Impact Report by SDDC and DCC refers to the independent review commissioned by those authorities which considered the submitted assessment and which concluded that the assessment was robust and in line with relevant industry guidance.</p>
9.6	Applicant SDDC	<p><u>Glint and glare – anti-reflective coating on the solar panels</u></p> <p>SDDC [REP1-029] recommended that a condition be attached to the consent for the submission of details of the solar panels and confirmation that an anti-reflective coating would be applied to them.</p> <p>The Applicant [REP3-032] has added provisions for anti-reflective coating to Table 4.2 of the Project Description [REP3-023] and Appendix B of the Design Statement [REP3-027].</p> <p>Requirement 6(1)(m) of the made <a href="#">Sunnica Energy Farm Order</a> includes for Local Planning Authority approval of the anti-reflective coating to be used on the solar modules. The ExA is considering whether to add a similar provision to the dDCO [REP3-008] to provide clarity, firmness, and the control suggested by SDDC.</p> <p>Please could the Applicant and SDDC comment?</p>	The Applicant has inserted the drafting at Requirement 6(1)(m) of The Sunnica Energy Farm Order 2024 at Requirement 5(1)(k) (detailed design approval) of the dDCO.
9.7	Applicant SDDC	<p><u>Glint and glare assessment</u></p> <p>Diane Abbott [REP1-043] raises other concerns about the glint and glare assessment, including (paragraph references in brackets):</p>	a) In almost all cases, the difference between assessing the midpoint and the top point of the panel would be negligible. In a very small number of cases, typically when assessing flat tracking panels, the panel height being above the receptor can mean that the modelling output would show no solar reflections are geometrically possible. Pager Power's modelling approach of

		<ul style="list-style-type: none"> <li>• modelling reflections from mid-height of the panel rather than the top (4.3, 4.4, 4.5);</li> <li>• only considering the ground floor of dwellings as possible receptors (4.9);</li> <li>• only considering receptors within a 1km radius (4.10);</li> <li>• local road users are only given a low sensitivity (4.12);</li> <li>• local residents only have a medium sensitivity (4.13);</li> <li>• significance of effect thresholds not to best practice guidance (4.14, 4.16, 4.17, 4.18); and</li> <li>• assessment of morning glare at properties near Oakland’s Farm (4.21).</li> </ul> <p>The Applicant’s responses <a href="#">[REP3-031]</a> include that:</p> <ul style="list-style-type: none"> <li>• the midpoint of the solar panel is used to undertake the geometric modelling as the model uses just a single height, but visibility and screening recommendations for glint and glare effects are based on the maximum height of the panels (4.3, 4.4, 4.5);</li> <li>• an observer on the ground floor is used for modelling purposes, but the upper floor is considered when determining the potential impacts of glint and glare (4.9);</li> <li>• a 1km study area for ground-based receptors is adopted because the proportion of an observer’s field of vision taken up by the reflecting area diminishes as separation distance increases and although solar reflections could be experienced from the panels at further distances than this, they are not considered significant (4.10);</li> <li>• the justification for local roads being of low sensitivity is provided in ES Chapter 14 <a href="#">[APP-167]</a>, which says that they typically have the lowest traffic densities and low potential impact of a distraction or degradation to safety and/ or operation (4.12);</li> <li>• the justification for dwellings being of medium sensitivity is provided in ES Chapter 14 <a href="#">[APP-167]</a>, which says that there is some capacity for observers to experience solar reflections for certain durations throughout the year or on any given day without causing a significant reduction in residential amenity (4.13);</li> <li>• the impact levels have been accepted on several projects in the UK and the assessment approach is considered appropriate (4.14, 4.16, 4.17, 4.18); and</li> <li>• the modelling output for the dwelling can be provided to Diane Abbott (4.21).</li> </ul> <p>a) Please could the Applicant justify how consideration of modelling using the mid-point of the panel is a reasonable worst case rather than modelling using a higher point?</p> <p>b) Please could the Applicant clarify how it considers visibility, screening, and impacts on the upper floors of dwellings if this does not (as the ExA understands) make use of the geometric model?</p> <p>c) Please could the Applicant justify how it concludes low potential degradation of safety to users of local roads, including horse riders, agricultural vehicles, and lorries?</p> <p>d) Please could the Applicant comment on the potential human health and well-being impacts of glint and glare, including on the occupiers of dwellings and horse riders?</p>	<p>using the ground height at the specific reflector points rather than taking an average of the ground height using the ground height at the panel area vertices mitigates against this.</p> <p>b) The geometric modelling is undertaken using a point on the ground floor of the dwelling. The modelling output using these points are then used as a proxy for the output of the upper floors because, in Pager Power’s experience, the difference in the modelling results from the ground floor and from the first floor is negligible. The judgement of visibility, screening, and impacts is then made qualitatively along with views from the ground floor using the available imagery and site photography.</p> <p>c) Low potential degradation is concluded as local roads have the lowest traffic densities and speeds. Traffic densities and speeds have a significant effect on the sensitivity of a road user because this has implications on their workload. A road user will require much greater level of concentration to safely travel along busy roads at high speeds, compared to the level of concentration required to safely travel along empty roads at slower speeds. This has been acknowledged in the Mabbett review as being a reasonable approach.</p> <p>d) Solar reflections from solar panels are similar to those from still water such as lakes, ponds, or wetlands (detailed further in Appendix B of the Appendix 14.1). These bodies of water are common in a rural environment and are often visible to residents and horse riders without risk to human health. The potential human health and well-being impacts of glint and glare arising from the Proposed Development on the occupiers of dwellings and horse riders are considered the same.</p> <p>e) No response required.</p>
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		e) Does SDDC have any concerns in relation to glint and glare? How might they be addressed?	
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10. Noise and vibration			
10.1	Applicant	<p><u>Data transcribing errors</u></p> <p>The Applicant [REP3-031 response to Diane Abbott] refers to errors transcribing data to Table 14 of ES Appendix 11.1 [APP-157] which is carried forward to Table 11.13 of ES Chapter 11 [APP-160], setting out the necessary corrections.</p> <p>For clarity, and in the interests of the later detailed management and mitigation plans, please could the Applicant update ES Chapter 11 [APP-160] and ES Appendix 11.1 [APP-157]?</p>	The Applicant has provided an amended version of ES Chapter 11 and ES Appendix 11.1 at Deadline 4 with those errors corrected.
10.2	SDDC	<p><u>Assessment criteria</u></p> <p>Diane Abbott [REP1-043 paragraphs 3.17 and 3.20] raises concerns about the baseline noise levels used in the assessment and the identification of Lowest Observable Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Levels (SOAEL).</p> <p>In its response the Applicant [REP3-031] says that the assessment criteria are agreed with SDDC.</p> <p>Does SDDC have any concerns in relation to the noise assessment criteria? How might they be addressed?</p>	The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.
10.3	Applicant SDDC	<p><u>Piling for the solar panels</u></p> <p>SDDC [APP-160 paragraph 11.101] is quoted as identifying piling during construction as the most significant noise impact.</p> <p>The Applicant [REP1-025 response to question 10.1] refers to mitigation including scheduling the work at times to minimise impact on nearest receptors, employing multiple rigs to reduce the time taken for piling in a given area before moving on, screening or low-noise plant models. It refers to mitigation measures set out in paragraph 2.2.3 of the Outline CEMP [REP1-007].</p> <p>Not all of the mitigation mentioned by the Applicant is included in the Outline CEMP [REP1-007] and none of it specifically refers to piling.</p> <p>a) Given the potential for noise impacts from piling during construction and SDDC's comments, and for clarity, please could the Applicant, in discussion with SDDC, update the Outline CEMP [REP1-007] to include the specific mitigation measures for piling?</p> <p>b) Please could SDDC comment at Deadlines 4 and 5?</p>	<p>a) The Applicant has added a commitment to securing mitigation relating to noise generated from piling solar panels to the Outline CEMP, specifically Paragraph 2.2.3.10, the delivery of which is secured by requirement 8 (construction environmental management plans) of the dDCO.</p> <p>b) No response required.</p>
10.4	Applicant	<p><u>Construction and delivery hours</u></p> <p><u>Other construction stage mitigation</u></p> <p>Please could the Applicant update the Outline CEMP [REP1-007] to ensure that it is correct, consistent with Requirement 20 of the dDCO [REP3-008] and the ES, and to reflect the firmness of the dDCO. For example, please consider changing:</p> <p>a) paragraph 1.15.1 – “are proposed to be” to “are to be”;</p> <p>b) paragraph 1.15.1 – “in exceptional circumstances” to “in emergency circumstances”;</p>	<p>a) Paragraph 1.15.1 of the Outline CEMP has been updated.</p> <p>b) Paragraph 1.15.1 of the Outline CEMP has been updated.</p> <p>c) Paragraph 1.15.2 of the Outline CEMP has been updated.</p> <p>d) The Applicant believes there is a typographical error in ExQ 10.4(d) when referencing Paragraph 1.15.3 and understands this to be a reference to</p>

		<p>c) paragraph 1.15.2 – “likely to cause a disturbance” to “that is audible at the boundary of the Order limits”;</p> <p>d) paragraph 1.15.3 – “will also be scheduled to occur” to “are also to occur”;</p> <p>e) paragraphs 2.2.1.2 and 2.2.1.3 to clarify that the activities referred to outside the construction hours, including directional drilling at night, are not to cause noise that is audible at the boundary of the Order limits; and</p> <p>f) paragraph 2.2.3.9 to refer to BS 5228 rather than BS 522811.</p>	<p>Paragraph 1.15.5. Paragraph 1.15.5 of the Outline CEMP has been updated.</p> <p>e) Text has been added to Paragraphs 2.2.1.2 and 2.2.1.3 of the Outline CEMP.</p> <p>f) Paragraph 2.2.3.8 (previously Paragraph 2.2.3.9) of the Outline CEMP has been updated.</p>
10.5	Applicant SDDC	<p><u>Operation stage noise limits</u></p> <p>SDDC [APP-160 Table 11.2] recommend that a condition be provided for a site noise limit at the boundary to be validated upon completion and maintained thereafter. SDDC [REP1-029 response to question 10.2] is satisfied with the proposed site noise limits.</p> <p>The Applicant [REP1-025 response to question 10.2] states that it is in discussion with SDDC and will ensure that the position is confirmed through a SoCG.</p> <p>Requirement 15 of the dDCO [REP3-008] makes provision for an “... operational noise assessment containing details of how the design of the authorised development has incorporated mitigation to ensure the operational noise rating levels as set out in the environmental statement are to be complied with ...”.</p> <p>The Outline OEMP [REP1-009 paragraph 4.5.1] refers to the need to submit an operational noise assessment and to Requirement 15, but provides no further detail.</p> <p>The ExA seeks to ensure that the proposed mitigation is secured in the dDCO [REP3-008] and Outline OEMP [REP1-009].</p> <p>a) For clarity, please could the Applicant, in discussion with SDDC, update the dDCO [REP3-008] and Outline OEMP [REP1-009] to ensure that they:</p> <ul style="list-style-type: none"> <li>• are consistent with each other and, between them, clearly secure the necessary mitigation without, for example, having to refer to the ES for operational noise rating levels;</li> <li>• incorporate SDDC’s requirements, including any for validation and maintenance of noise limits; and</li> <li>• ensure that there would not be any materially new or materially more adverse environmental effects compared to those identified in the ES?</li> </ul> <p>b) Please could SDDC comment?</p>	<p>a) The text in the Outline OEMP (Paragraph 4.5.1) has been updated to ensure it is consistent with Requirement 15 (operational noise) in the dDCO and therefore, the dDCO does not require updating in this respect. The operational noise rating levels from the ES have been included in the Outline OEMP (Paragraph 4.5.2) to ensure mitigation is clearly secured without need to reference the ES. Requirement 15 of the dDCO has also been updated to refer to the operational noise rating levels as set out in the Outline OEMP, rather than the ES. The subsequent bullet points in ExQ2 Q10.5 have also been incorporated into the Outline OEMP, submitted at Deadline 4.</p> <p>b) No response required.</p>
10.6	Applicant	<p><u>Other operation stage mitigation</u></p> <p>Paragraph 2.2.3.3 of the Outline CEMP [REP1-007] states that plant would be selected to provide oversizing and redundancy. Paragraph 2.2.3.7 refers to a stand-off distance of at least 100 m between solar plant and residential properties. Paragraph 2.2.3.8 relates to the location and specification of operational equipment.</p> <p>Should these measures be included in the Outline OEMP [REP1-009] as they are relevant to operation stage mitigation?</p>	<p>Reference to stand-off distance (Paragraph 2.2.3.7) and location and specification of operational equipment (Paragraph 2.2.3.8) have been removed from the Outline CEMP. These have been added to Section 4.5.1 of the Outline OEMP.</p> <p>Reference to oversizing and redundancy remains in Paragraph 2.2.3.3 of the Outline CEMP however, it is made clear this is in relation to construction plant. There is also reference to oversizing and redundancy in the Outline OEMP (Paragraph 4.5.1).</p>

<b>11. Traffic and transport</b>			
11.1	Applicant DCC	<p><u>Field surveys for non-motorised users (NMU)</u></p>	<p>The Applicant has undertaken further engagement with DCC regarding Non-Motorised Users (NMU). During a meeting on 20th August 2024, DCC explained</p>

		<p>DCC [REP1-026] say that a summer survey would be appropriate to assess the use of the site, including by non-motorised users, particularly during the summer holiday period of July and August.</p> <p>SDDC [REP1-029] consider that the timing of the field work is not detrimental to the assessment work submitted.</p> <p>The Applicant [REP1-025, REP3-032] says that it has adopted a proportional approach to assessing NMU that does not rely on NMU counts. It examines the local walking and cycling facilities and the sensitive receptors that are likely to act as an attractor for NMUs, and analyses the highway operation and the additional traffic, to assess a significance of effect.</p> <p>Does DDC have any remaining concerns in relation to field surveys for NMU? How might they be addressed?</p>	<p>that during the summer months, there may be more NMUs and therefore this should be considered within the assessment presented in ES Chapter 10 [APP-155].</p> <p>It was agreed with DCC that NMU surveys would be undertaken during the school summer period, in locations near to a Public Right of Way (PRoW) and equestrian facilities. On that basis, NMU surveys were undertaken at two locations outlined below:</p> <ul style="list-style-type: none"> <li>• Site 1: Walton Road / PRoW</li> <li>• Site 2: Cotton Lane / PRoW</li> </ul> <p>Additionally, Walton Road and Cotton Road are both identified within ES Chapter 10 [APP-155] as being near to receptors with 'Medium' sensitivity and are therefore potentially more likely to be susceptible to changes in construction traffic.</p> <p>The NMU surveys were undertaken over the course of three days from Tuesday 27th August – Thursday 29th August 2024, to ensure that a 'typical' volume of daily NMU movements could be captured.</p> <p>It should be noted that the camera at Site 2 was removed after the first survey day by a local resident who was concerned that the camera was overlooking their property and hence intruding on their privacy. However, it should be emphasised that the survey still obtained a full days' worth of data which remained useable.</p> <p>As part of further engagement on 19th September 2024, the results of the NMU survey were presented to DCC and are provided at <b>Appendix A</b> of this document. The number of NMU movements were relatively low, with a maximum of 59 NMU movements across the three-day survey at Site 1, and 81 NMU movements at Site 2. The Applicant emphasised that the potential impact of construction traffic will not surpass the threshold to change the scoring within the ES Chapter 10 [APP-155]. DCC agreed with the methodology and outcome of the NMU surveys and agreed that no further assessment would be required.</p>
11.2	Applicant DCC SDDC SCC	<p><u>Securing the construction traffic routes</u></p> <p>The Applicant [REP1-025 response to question 11.4] says that subject to responses from others, it is content to amend the Outline CTMP [REP1-009] to secure that:</p> <ul style="list-style-type: none"> <li>• construction route Scenario 2A to only be used if Scenario 1 (using Walton-on-Trent bypass) is not available; and</li> <li>• construction route Scenario 2B to only be used if Scenarios 1 and 2A are not available.</li> </ul> <p>a) Are DCC, SDDC, or SCC content for the Outline CTMP [REP1-009] to be updated to secure the above?</p> <p>b) Please could the Applicant, following discussion with DCC, SDDC, and SCC, update the Outline CTMP [REP1-009] accordingly?</p>	<p>a) No response required.</p> <p>b) Paragraphs 3.31-3.32 of the OCTMP submitted at Deadline 4 have been updated to secure the following:</p> <ul style="list-style-type: none"> <li>• Construction route Scenario 2A to only be used if Scenario 1 (using Walton-on-Trent bypass) is not available; and</li> <li>• Construction route Scenario 2B to only be used if Scenarios 1 and 2A are not available.</li> </ul> <p>SCC have queried if construction route Scenario 2B could be used to assign a proportion of HGV traffic regardless of the availability of Scenario 2A route. The Applicants justification for a Scenario 2A 'default' is set out in [REP3-029] and is further discussed in the Applicant's response to ExA Q11.4.</p>
11.3	Applicant DCC SDDC	<p><u>Construction traffic – DCC and SDDC concerns</u></p> <p>DCC and SDDC [RR-078, RR-295, REP1-026, REP2-001] raise concerns including in relation to:</p> <ul style="list-style-type: none"> <li>• infringement of the 7.5 tonne Environmental Weight Limit in the locality;</li> </ul>	<p>a) The Applicant has provided a full summary of the position reached with SDDC and DCC in respect of the SoCG in its Deadline 4 version of the Statements of Common Ground – Status Document [Doc 8.0]. The Applicant is continuing discussions with SDDC and DCC, including transport matters, and will provide a further update on the status of the SoCG with those parties in early October 2024.</p>

- further assessments are required to establish the impacts of HGV movements during construction and decommissioning, particularly regarding the impacts of goods vehicle access through urban areas and along relatively quiet country roads;
- the Applicant to work in consultation with the Highway Authority and the organisers of events in the locality to ensure that vehicle movement routes and timings can be coordinated for the avoidance of congestion;
- weight and width restrictions on bridges, traffic control and monitoring to ensure compliance with routing and timing requirements, working in consultation with the Highway Authority to reduce the potential for related adverse impacts on congestion;
- a pinch point at Cotton-in-the-Elms with very narrow local roads where residents park on either side of the road (reference construction route Scenario 2B);
- disruption to farm traffic and rural business through the increase of road usage by HGVs accessing the site during the construction stage;
- safe and satisfactory means of access to each of the individual compounds comprising the wider site;
- ensuring that there are no fundamental safety considerations regarding the wider highway network, including that suitable manoeuvring of HGV vehicles (swept-path analysis) can be readily achieved along the narrow country lanes; and
- it is anticipated that the Applicant would be responsible for keeping the highway clear of debris, preventing the trafficking of mud onto the road and rectifying of additional harm caused to the network assets demonstrably caused by the Applicant or its contractors to the satisfaction of the Highway Authority.

The Applicant [\[REP1-025\]](#) reports that DCC and/ or SDDC require review or clarification of:

- cumulative traffic impact - other projects and event management;
- communication plans with the local community, stakeholders, and events during construction;
- controls on vehicle movements during highway incidents and emergency road closures;
- controls on vehicle movements during school pick up/ drop off times;
- remedial measures to address infringement of designated construction vehicle route; and
- communication plans with local community, and stakeholders.

The Applicant's responses [\[REP1-023\]](#), [\[REP1-025\]](#), [\[REP3-032\]](#) include that:

- paragraph 5.15 of the Outline CTMP [\[REP1-021\]](#) contains a firm commitment by the Applicant to engage with Catton Hall, the National Memorial Arboretum, DCC and SCC to agree the timing of construction vehicles so as to not disrupt event traffic;
- HGVs would not be permitted to travel through the villages of Walton-on-Trent or Rosliston, table 3-3 of the Outline CTMP [\[REP1-021\]](#) identifies the sensitive

b) The Applicant confirms that an updated OCTMP has been submitted at Deadline 4.

c) A meeting was held between the Applicant, DCC and SDDC on 19th September 2024 and the Applicant has addressed the residual matters in the Deadline 4 OCTMP. The following table sets out the matters raised and where they are addressed in the document. The Applicant considers all residual matters to be addressed.

Doc ref	Issue
5.3-5.5	Agreements with highway authorities for alteration and maintenance of the highway
5.43	Commitment to a detailed survey and review of the AIL route prior to commencement of construction when the haul vehicle specification established.
6.3-6.4	Establishment of the Traffic Management Group 6 months prior to construction. Frequency of meeting increased to 2 months.
6.6	Additional Traffic Management Group engagement for events and other projects

		<p>built up areas to be avoided by construction traffic including Walton-on-Trent and outlines mitigation in the form of a signing strategy (Section 4), contractor information packs (paragraph 5.36), and compliance measures (paragraph 6.10);</p> <ul style="list-style-type: none"> <li>• Section 6 of the Outline CTMP [REP1-021] includes for a Traffic Management Group (TMG) to oversee the implementation of the CTMP and the appointment of a Transport Co-ordinator, accountable for monitoring and reporting to the TMG;</li> <li>• it is expected that full details of monitoring systems would be agreed with the relevant highway authorities in the preparation and approval of the CTMP;</li> <li>• DCC confirm that it is reviewing the highway asset provisions and measures and will revert with any concerns; and</li> <li>• it is engaging with DCC and SCC on transport matters to be agreed in a SoCG and additional measures will be added to the Outline CTMP [REP1-021] if needed.</li> </ul> <p>a) Please could the Applicant provide a draft copy of the SoCG with DCC and SDDC at Deadline 4, and set out the construction traffic matters yet to be agreed with DCC and SDDC, and the next steps to be taken to address them?</p> <p>b) Please could the Applicant submit the updated Outline CTMP [REP1-021]?</p> <p>c) Please could DCC and SDDC set out any remaining construction traffic or highway asset protection concerns at Deadlines 4 and 5, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</p>	
11.4	SCC Applicant	<p><u>Construction traffic – SCC concerns</u></p> <p>SCC [REP1-031] raise concerns including in relation to:</p> <ul style="list-style-type: none"> <li>• why routes 2A and 2B could not be used in conjunction with one another to spread the impacts of construction traffic across the network rather than focussing it on a particular route;</li> <li>• consideration to the movement of young pedestrians who would potentially need to cross and/ or walk along the construction traffic route on their way to/from school for which the Outline CTMP [REP1-021] should restrict the movement of HGV traffic on route 6 during the morning and afternoon school runs during term time;</li> <li>• whether the construction of the Drakelow Park development has been accounted for in the impacts of construction traffic;</li> <li>• the consideration given to potential delays at a narrow bridge on Rosliston Road over the railway as construction traffic Route 6 enters Derbyshire;</li> <li>• potential impacts from construction traffic not using prescribed construction routes;</li> <li>• it is not clear whether the dDCO [REP3-008] provides for works to remedy any damage caused and attributable to the solar farm development to be undertaken by the developer or whether there are powers for the local highway authority to agree the detail of the works and approve the workmanship of any work undertaken; and</li> </ul>	<p>a) No response required.</p> <p>b) Further engagement has been undertaken with SCC on 23rd August 2024 and 18th September 2024 to discuss concerns raised at Examination Deadline 1. The following responses address each listed bullet point:</p> <ul style="list-style-type: none"> <li>• With reference to ES Chapter 10, Figure 10.2, 10.3 and 10.4 [APP 156] it can be noted that the construction routes used as part of Scenario 2A and 2B are similar. The key difference between the two scenarios is the re-routing of Heavy Vehicles, and a proportion of Light Vehicles from Route 6 (through Burton on Trent and Stapenhill) to Route 8 (through Coton in the Elms).</li> </ul> <p>The impact of Heavy Vehicle Traffic along Route 6 through Burton on Trent and Stapenhill would result in no more than a 3% increase on baseline daily Heavy Vehicle traffic and less than 1% of total daily traffic, as shown in Table 10.22 of ES Chapter 10 [APP-155].</p> <p>Should Heavy vehicles use Route 8, the impact of Heavy Vehicle traffic through Coton in the Elms would result in an increase of 87% of baseline daily Heavy Vehicle Traffic and 1% of total daily traffic, as shown in Table 10.26 of ES Chapter 10 [APP-155].</p> <p>It is evident that Route 6 caters for Heavy Vehicle movements, compared to links along Route 8 which are more rural in nature. This means sensitive receptors adjoining Route 8 (e.g communities in Coton in the Elms) are more likely to experience a greater level of Severance in comparison to residents</p>

		<ul style="list-style-type: none"> <li>the Outline CTMP [REP1-021] include provision for recouping of any costs incurred by the local highway authority in undertaking emergency repair work of damage caused by construction traffic.</li> </ul> <p>The Applicant's responses [REP3-031] include that:</p> <ul style="list-style-type: none"> <li>during pre-application it was agreed with DCC and SCC that a hierarchy of routes would be supported for HGV, whereas for lighter construction vehicles it was agreed the dispersion of these lighter vehicles across the network would be acceptable;</li> <li>paragraph 5.5 of the Outline CTMP [REP1-021] has been amended to require all HGV movements to occur outside of the traditional local highway network peak periods, including School Drop off (08:30-09:30) and School Pick up (15:00-16:00);</li> <li>Drakelow Park is currently being built out and construction traffic has been captured in the baseline traffic surveys that were undertaken in 2022;</li> <li>the average of 14 HGV movements per day with restrictions to HGV movements to occur outside peak periods mean that there is unlikely to be material delays at the railway bridge above those occurring within baseline condition; and</li> <li>the Outline CTMP [REP1-021] requires contractors to use the prescribed construction vehicle routes such as contractual agreements and financial penalties for breaches thereby discourage use of non-prescribed construction routes.</li> </ul> <p>a) Please could SCC set out any remaining construction traffic concerns and suggest how their issues might be resolved?</p> <p>b) Please could the Applicant comment?</p>	<p>in Stapenhill and Burton given they are unfamiliar with Heavy Vehicles routing through the village.</p> <p>In addition, the magnitude of impact of the construction vehicle traffic on Route 8 on links such as Mill Street and Church Street for Fear and Intimidation was assessed as 'Great' (50), as shown in Table 10.23 in ES Chapter 10 [APP-155]. In comparison, the magnitude of impact on key links along Route 6 such as Main Street and Rosliston Road for Fear and Intimidation was scored as 'Moderate' (40), as shown in Table 10.27 in ES Chapter 10 [APP-155]. Again, this emphasises that residents within Coton in the Elms are likely to be more susceptible to the impacts of heavy vehicle traffic.</p> <p>Whilst it is noted that the effects outlined are mitigated to minor significance (residual), that is acknowledgement that any impact on Route 8 would be very temporary in nature, so should there be a prolonged period of Heavy Vehicle movements there is a risk the residual negative effects could be significant.</p> <p>On that basis, it has been determined that Scenario 2B would only be suitable to use should an obstruction or closure make Route 6 under Scenario 2A, unusable.</p> <ul style="list-style-type: none"> <li>Further dialogue has been undertaken with SCC to address their concerns in relation to young pedestrians accessing local schools within the vicinity of Route 6. It was noted by SCC during further engagement on 18th August 2024, that schools within proximity to Route 6 do not have uniform school pick-up and drop off periods.</li> </ul> <p>On that basis, the OCTMP (Paragraph 5.8-5.9) is updated to confirm that the restrictions on Heavy Vehicle movements during the school pick-up and drop-off periods will be indicative and will be confirmed following further engagement with SCC and the Local Education Authority.</p> <ul style="list-style-type: none"> <li>The Applicant discussed the concern raised by SCC in regard to the cumulative impact of the Drakelow Park development traffic during further engagement on 23rd August 2024.</li> </ul> <p>The Applicant can confirm that this was considered within ES Chapter 10 [APP-155], noting the fact that the anticipated construction phase of the Proposed Development will not commence until 2026, by which time the construction phase of the Drakelow Park development is unlikely to be as intensive, however it is noted that there could be an interface with Walton Bypass construction traffic.</p> <p>SCC stated during the engagement session that they would be satisfied through a mechanism within the OCTMP and the final CTMP which commits to continued engagement with Countryside Homes to monitor construction traffic associated with both developments and address any potential issues that could occur as a result.</p>
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			<p>The OCTMP is updated (Paragraphs 6.3-6.6) to provide firm commitment to the establishment of a Traffic Management Group (TMG) which is inclusive of Countryside Homes. Notably, the frequency of engagement has been increased to 2 months to ensure that more regular monitoring can be undertaken, and any issues can be dealt with in a prompt manner.</p> <ul style="list-style-type: none"> <li>The Applicant can confirm that further engagement with DCC was undertaken on 20th August 2024 during which the concern raised in regard to the 'pinch point' on Rosliston Road railway bridge, was discussed.</li> </ul> <p>The Applicant confirmed that the number of daily movements together with delivery management to evenly spread Heavy Vehicle demand through the day would ensure that there is unlikely to cause any significant delay. The issue will be monitored and kept under review throughout the construction and on that basis, DCC do not have any material concerns regarding this matter.</p> <ul style="list-style-type: none"> <li>Following discussions with SCC on 23rd August in relation to construction traffic adhering to the prescribed routes, further detail has been added to the OCTMP with regards to locations of potential temporary construction traffic signage and corrective measures enforced on contractors.</li> </ul> <p>Specifically, Paragraphs 4.1 to 4.4 of the OCTMP are updated to include details regarding the potential wording that will be placed on temporary signs, along with indicative locations for temporary signage for each construction vehicle routing scenario. It is reiterated that the wording on temporary signs is categorised around Heavy Vehicle restrictions specific to the proposed development so as not to use unprescribed routes unsuitable for Heavy Vehicles, warnings to the general public of the presence of construction traffic, and directional signage to enforce the construction vehicle routes to contractors. A commitment is included to provide a detailed signage schedule pre-construction.</p> <p>To support the signage strategy, further detail has been provided in Paragraphs 6.10-6.11 of the OCTMP on remedial measures and contractual penalties should contractors not comply with the designated construction vehicle routes.</p>
11.5	LCC Applicant	<p><u>Construction traffic – LCC concerns</u></p> <p>LCC [RR-170, REP1-027, REP2-002] raises concerns in relation to the potential impact of Abnormal Indivisible Loads (AIL) movements on communities within Leicestershire and says that the application is silent on this. It considers that surface protection, culvert reinforcement and temporary removal of street furniture will be required at locations along the AIL route and seeks protection of its assets and recovery of any associated costs through provisions within the DCO. LCC would welcome engagement with The Applicant as soon as possible to address these concerns.</p> <p>The Applicant [REP1-023, REP3-033] says that the environmental effects for AIL are assessed in ES Chapter 10 [APP-155] and related mitigation measures are secured under Requirement 10 (construction and traffic management plan) of the dDCO [REP3-008] and included in the Outline CTMP [REP1-021]. It does not identify any need for surface</p>	<p>a) No response required.</p> <p>b) ESDAL address the processes for securing an AIL movement ensuring that all highway alterations are identified, and that consultation is carried out with the relevant highway and bridge authorities. However, LCC raised residual concerns relating to notice periods (requesting longer notice periods than those specified in ESDAL) and to how the powers for highway alteration would be secured. These matters are addressed in the D4 revisions to the OCTMP as set out in the table below. The Applicant considers this to address LCCs concerns in full, in relation to this specific matter.</p> <p>c) No response required.</p>

		<p>protection, culvert reinforcement, and temporary removal of street furniture and says that no mitigation measures are required on section of the AIL route within LCC's jurisdiction. The Applicant refers to a legal requirement for itself under the Electronic Service Delivery for Abnormal Loads system to provide mitigation and says that AIL movements would be subject to a separate application and permitting scheme, currently administered by National Highways in consultation with the relevant highway authorities and police, a process that would be supported by additional route assessment and validation, including additional surveys as required. The Applicant reports that it will be engaging further with LCC during the Examination and is waiting for a response to correspondence sent on 15th August 2024.</p> <p>a) Please could LCC identify where it considers that surface protection, culvert reinforcement and temporary removal of street furniture would be required at locations along the AIL route?</p> <p>b) Please could the Applicant provide more information on the separate application and permitting scheme that it mentions and set out the extent to which it would address LCC's specific concerns?</p> <p>c) Does LCC consider that the separate application and permitting scheme mentioned by the Applicant would be sufficient for the protection of LCC's assets and recovery of LCC's costs rather than these being matters for the DCO to deal with? If not, why not?</p> <p>d) Please could LCC set out any remaining construction traffic or highway asset protection concerns at Deadlines 4 and 5, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</p> <p>e) Please could the Applicant comment?</p>	<p>d) No response required.</p> <p>e) The Applicant met with LCC on the 16 September 2024 and discussed their concerns relating to AILs. The following table summarises how the Deadline 4 OCTMP revision has addressed those concerns:</p> <table border="1" data-bbox="1745 380 2772 1465"> <thead> <tr> <th data-bbox="1745 380 2133 449">Doc ref</th> <th data-bbox="2133 380 2772 449">Issue</th> </tr> </thead> <tbody> <tr> <td data-bbox="1745 449 2133 751">3.14 – 3.16</td> <td data-bbox="2133 449 2772 751">Sets out the Electronic Service Delivery for Abnormal Loads (ESDAL) permitting scheme, which ensures that all highway alterations are identified and that consultation is carried out with the relevant highway and bridge authorities. LCC has agreed ESDAL is the correct permitting scheme for abnormal deliveries in LCC's area.</td> </tr> <tr> <td data-bbox="1745 751 2133 856">5.3 - 5.5</td> <td data-bbox="2133 751 2772 856">Agreements with highway authorities for alteration and maintenance of the highway</td> </tr> <tr> <td data-bbox="1745 856 2133 1062">5.42</td> <td data-bbox="2133 856 2772 1062">Sets out the provisions for the relevant highway authorities to recover excess expenses with respect to highway defects caused by extraordinary traffic to facilitate the construction of the authorised development.</td> </tr> <tr> <td data-bbox="1745 1062 2133 1297">5.43</td> <td data-bbox="2133 1062 2772 1297">Commitment to a detailed survey and review of the AIL route prior to commencement of construction when haul vehicle specification is established. A mechanism for the technical approval of any highway interventions to facilitate AIL movements.</td> </tr> <tr> <td data-bbox="1745 1297 2133 1465">6.6</td> <td data-bbox="2133 1297 2772 1465">LCC added to the list of invitees for the Traffic Management Group to allow AIL movements to be discussed in advance of permit applications.</td> </tr> </tbody> </table>	Doc ref	Issue	3.14 – 3.16	Sets out the Electronic Service Delivery for Abnormal Loads (ESDAL) permitting scheme, which ensures that all highway alterations are identified and that consultation is carried out with the relevant highway and bridge authorities. LCC has agreed ESDAL is the correct permitting scheme for abnormal deliveries in LCC's area.	5.3 - 5.5	Agreements with highway authorities for alteration and maintenance of the highway	5.42	Sets out the provisions for the relevant highway authorities to recover excess expenses with respect to highway defects caused by extraordinary traffic to facilitate the construction of the authorised development.	5.43	Commitment to a detailed survey and review of the AIL route prior to commencement of construction when haul vehicle specification is established. A mechanism for the technical approval of any highway interventions to facilitate AIL movements.	6.6	LCC added to the list of invitees for the Traffic Management Group to allow AIL movements to be discussed in advance of permit applications.
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11.6	Applicant	<p><u>Construction stage mitigation</u></p> <p>The Applicant [REP1-025 Appendix D] provides detailed justification for why mitigation measures would reduce magnitude of effect from moderate adverse to minor adverse for instances queried by the ExA [PD-010 question 11.6] and sets out the specific mitigation measures necessary to achieve that.</p> <p>For clarity, and to assist with the later production of the detailed CTMP, please could the Applicant add its full response to the Outline CTMP [REP1-021] or ES Chapter 10 [APP-155]?</p>	<p>The Applicant confirms that the Deadline 4 OCTMP is updated to include Appendix D of REP1-025 at Appendix B.</p>												
11.7	DCC	<p><u>Travel Plan</u></p> <p>DCC [REP1-026] say that a Travel Plan should be provided in outline during the examination and suggests that early consideration of travel planning will enable the</p>	<p>The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.</p>												



		<p>Highway Authority to provide advice and traffic management to keep disruption to a minimum.</p> <p>The Applicant [REP1-025, REP3-032] has updated the Outline CTMP [REP1-021] to provide further detail about the content of the Travel Plan.</p> <p>Please could DCC comment on the provisions for a Travel Plan in the Outline CTMP [REP1-021], set out any remaining concerns in relation to travel planning and suggest how their issues might be resolved?</p>	
11.8	Applicant	<p><u>Works outside the Order limits</u></p> <p>The Applicant [REP1-025] says that alteration to streets references AS-G1 and AS-E1 on the Streets Access and Rights of Way Plan [AS-004] are both outside the Order Limits, are not necessary and have not been identified as mitigation within the ES.</p> <p>For clarity, please could references to those alterations be removed from the application documents?</p>	<p>The Applicant has at Deadline 4 submitted an amended version of the Streets, Access and Rights of Way Plan with street references AS-G1 and AS-E1 removed. References to AS-G1 and AS-E1 have also then been removed from Schedule 3 of the dDCO.</p>
11.9	DCC	<p><u>Maintenance of verges – plots 02-045 and 02-048</u></p> <p>The Book of Reference [REP3-017] seeks the acquisition of the freehold of a section of verge on Rosliston Road.</p> <p>DCC [REP1-026] say that the maintenance of the verge, for the purposes of highway safety, must be included in the programme of general site maintenance.</p> <p>The Applicant [REP1-025, REP3-032] say that it is not seeking powers to stop up the adopted highway, that DCC's powers as highways authority would not be interfered with and DCC would continue to be able to maintain the verge as necessary.</p> <p>Does DCC have any remaining verge maintenance concerns? How might their issues be resolved?</p>	<p>The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.</p>
11.10	Applicant DCC	<p><u>Draft DCO [REP3-008] Article 9 - Power to alter layout, etc., of streets</u></p> <p><u>Draft DCO [REP3-008] Article 10 – Access to works</u></p> <p>DCC [REP1-026] expect the Applicant to fully engage with the Highway Authority to ensure that any proposed temporary or permanent alterations to the road layout or structure are acceptable in terms of highway safety and for the long-term future maintenance of the highway.</p> <p>Applicant [REP3-032] says that Article 9 (power to alter layout, etc., of streets) ensures that the undertaker will engage fully with the highway and street authorities regarding the acceptability of any alterations to the layout etc. of streets and access to works.</p> <p>Draft DCO [REP3-008] Article 9(5) refers to consent not being required where the undertaker is the street authority for a street in which the works are being carried out.</p> <p>Draft DCO [REP3-008] Article 10(a) and 10(b) does not require Highways Authority consent.</p> <p>a) Please could the Applicant clarify how DCC's requirement (as the ExA interprets) for Highways Authority consent would be met?</p> <p>b) Please could DCC set out any remaining concerns at Deadline 5 and set out how they might be resolved?</p>	<p>(a) Article 10(1)(a) and 10(1)(b) grants consent for the undertaker to carry out access works at the locations specified in Schedule 4 (access to works). The detail of these works is subject to Requirement 5 (detailed design approval) whereby, amongst other things, details of the layout of the authorised development, hard surfacing materials, vehicular and pedestrian access, parking and circulation areas must be submitted to and approved in writing by the local planning authority. In practice, this will include the local planning authority consulting the highway authority to approve these details where appropriate. Requirement 10 (construction traffic management plan) also requires the CTMP to be approved by the local planning authority in consultation with the relevant highway authority(ies), further securing the highway authority's consent where appropriate for the authorised development.</p> <p>Article 10(1)(c) permits the undertaker to form and layout other means of access or improve existing means of access with the prior approval of the local planning authority, in consultation with the highway authority, at such locations within the Order limits as the undertaker reasonably requires for the purposes of the authorised development. DCC's requirement for highways authority consent would subsequently be needed for this limb.</p> <p>The Applicant's approach set out above is consistent with recent DCO precedent, including Article 12 (access to works) of The Sunnica Energy Farm Order 2024 and Article 13 (access to works) of The Cottam Solar Project Order 2024. The Applicant also considers its approach to be</p>

			<p>consistent with The Mallard Pass Solar Farm Order 2024 and The Gate Burton Energy Park Order 2024 which differ slightly to the dDCO in respect of this article, but also do not require consent from the highway authority beyond the scope of Article 10(1)(c) of the dDCO.</p> <p>No further action is therefore proposed.</p> <p>(b) No response required.</p>
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12. Water quality, resources, drainage, and flooding			
12.1	Applicant EA	<p><u>Water Framework Directive (WFD)</u></p> <p>The EA [<a href="#">AS-019</a>, <a href="#">REP1-033</a>, <a href="#">REP3-001</a>] expect an updated WFD Assessment to address matters that have not been agreed:</p> <ul style="list-style-type: none"> <li>• Ecology. Water Environment Report / WFD with regards to potential culverting of Ordinary Watercourses.</li> <li>• Geomorphology. Water Environment Report / WFD.</li> <li>• Groundwater protection. WFD assessment needs to include WFD Groundwater Body.</li> </ul> <p>The Applicant [<a href="#">REP1-025</a>] advises that it is providing a revised WFD Assessment to the EA for review and will provide an update on the position of those discussions at Deadline 3. It is engaging with the EA to progress and agree a SoCG.</p> <p>a) Please could the Applicant provide a draft copy of the SoCG with EA at Deadline 4, and set out the WFD Assessment matters yet to be agreed with NE, and the next steps to be taken to address them?</p> <p>b) Please could the Applicant submit the updated WFD Assessment?</p> <p>c) Please could EA set out any remaining WFD concerns at Deadlines 4 and 5, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</p>	<p>a) The Applicant has continued to discuss the Application with the EA since Deadline 3. The EA has provided the Applicant with its submissions at Deadline 4, including its Works Package Tracker, which records the WFD as 'Working on a solution' but on the basis that the EA will record that matter as agreed once the amended WFD Assessment is showing on the PINS website.</p> <p>b) Accordingly, given the context in a), the Applicant has at Deadline 4 submitted clean and tracked versions of the updated WFD Assessment.</p>
12.2	DCC	<p><u>Water Quality and Silt Management Plan</u></p> <p>DCC [<a href="#">REP1-026</a>] suggest that Outline Water Quality and Silt Management Plans should be provided in outline during the examination to help ensure that those actions necessary to prevent adverse impacts on site drainage and local water courses can be fully considered at an early stage in the development process.</p> <p>EA [<a href="#">REP2-003</a>] do not require an Outline Water Quality and Silt Management Plan.</p> <p>The Applicant has added matters to be included in Water Quality and Silt Management Plan to paragraph 2.6.9 of the Outline CEMP [<a href="#">REP1-007</a>].</p> <p>Does DCC have any remaining concerns regarding the Water Quality and Silt Management Plan? How might any issues be resolved?</p>	<p>The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.</p>
12.3	DCC	<p><u>Stopping up or culverting of water courses</u></p> <p>DCC [<a href="#">REP1-026</a>] say that as Lead Local Flood Authority, it would seek to be consulted prior to any stopping up or culverting of water courses in connection with site works, whether temporary or permanent, for the prevention of flooding or any adverse impacts attributable to the works.</p>	<p>The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.</p>

		<p>The Applicant [REP3-032] notes that Part 7 of Schedule 10 of the dDCO [REP3-008] contains provisions for the protection of drainage authorities. The protective provisions require the undertaker to consult with the drainage authority before beginning to construct any “specified works” (as defined in Part 7 of Schedule 10) and allows the drainage authority to impose reasonable requirements on the undertaker.</p> <p>Does DCC have any remaining concerns regarding consultation prior to the stopping up or culverting of water courses? How might any issues be resolved?</p>	
12.4	DCC	<p><u>Surface Water Management Plan</u></p> <p>DCC [REP1-026] say that the submission of an Outline Surface Water Management Plan would help to ensure that surface waters are adequately managed for the prevention of flooding, conservation of ecological interest and the prevention of pollution.</p> <p>EA [REP2-003] do not require an Outline Surface Water Management Plan.</p> <p>The Applicant [REP3-032] has updated the Section 2.6 of the Outline CEMP [REP1-007] regarding the management of surface water during construction and suggests that this performs the role of an outline Surface Water Management Plan by identifying the expected measures to be used.</p> <p>Does DCC have any remaining concerns regarding the Surface Water Management Plan? How might any issues be resolved?</p>	The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.
12.5	Applicant EA	<p><u>Flood Risk Assessment (FRA)</u></p> <p>The EA [AS-019, REP1-033, REP3-001] expect an updated FRA to address matters that have not been agreed in relation to the Sequential Test, Exception Test, climate change allowance, and detailed flood modelling.</p> <p>The Applicant [REP1-025, REP3-032] expects to submit an amended FRA at Deadline 4. It is engaging with the EA to progress and agree a SoCG.</p> <ol style="list-style-type: none"> <li>Please could the Applicant provide a draft copy of the SoCG with EA at Deadline 4, and set out the FRA matters yet to be agreed with NE, and the next steps to be taken to address them?</li> <li>Please could the Applicant submit the updated FRA?</li> <li>Please could EA set out any remaining FRA concerns at Deadlines 4 and 5, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</li> </ol>	<p>a) The EA has provided the Applicant with its submissions at Deadline 4. The Works Package Tracker submitted by the EA at Deadline 4 records that an updated FRA was provided to the EA by the Applicant on the 11<sup>th</sup> September 2024 and that the EA are currently reviewing that document.</p> <p>The EA expect to be able to provide an update to the Applicant shortly after Deadline 4 and the Applicant will seek to provide an update to the ExA prior to the agenda for the October 2024 Issue Specific Hearings being published by the 15<sup>th</sup> October 2024.</p> <p>b) The Applicant will await the comments of the EA on the latest amendment of the FRA and will submit the updated FRA once it has resolved any outstanding matters, as it expects to be able to provide an update and the updated FRA shortly after Deadline 4.</p> <p>c) No response required.</p>
12.6	EA DCC	<p><u>Obstructions to flood waters</u></p> <p>The EA [REP1-032] say that if it is found that water is at sufficient depth to reach the solar panels then a Maintenance Plan would be required, which should be specified under the Outline OEMP [REP1-009], and include:</p> <ul style="list-style-type: none"> <li>check periodically for penitential debris which could be moved by flood water (fallen trees etc) and removal;</li> <li>checks and clearance of all flood debris after a storm event; and</li> <li>checks of the structural integrity of the solar panels after a storm event to reduce the risk of falling and causing blockages.</li> </ul> <p>The Applicant [REP1-025, REP3-032] considers that there is no significant potential for debris to build-up on the legs of the solar panel support structures which could create any meaningful implications for flood risk and drainage.</p>	The Applicant will review responses by other parties to this question, before commenting on those submissions as necessary at Deadline 5.

		<p>a) Does DCC, as Lead Local Flood Authority, consider that the Outline OEMP [REP1-009] should be updated as suggested by the EA?</p> <p>b) Do the EA or DCC have any remaining concerns regarding potential obstructions to flood waters? How might any issues be resolved?</p>	
12.7	<p>Applicant EA DCC SDDC</p>	<p><u>Piling and underground cabling</u></p> <p>DCC and SDDC [REP1-026, REP1-029, REP2-001] consider it inevitable that land drains would be compromised by piling and underground cables. They suggest that these may alter localised drainage patterns through the interruption of flows during the construction, operation, and decommissioning stages. Councillor Amy Wheelton [REP1-039] raises related concerns.</p> <p>The Applicant [REP3-031, REP3-033] says that although piling may disturb or break up land drains, the number affected is expected to be minimal and that in the unlikely event that any significant drainage issue emerges due to construction activity, it would use measures such as SuDS, replacing or repairing land drains to rectify the situation.</p> <p>a) Please, following consultation with the EA, DCC and SDDC, could the Applicant set out how it has assessed the potential for the piling and underground cables to impact on land drainage and flooding at each stage of the Proposed Development, and advise how any necessary mitigation measures, including SuDS, replacing or repairing land drains, are secured?</p> <p>b) Do the EA, DCC, or SDDC have any remaining concerns regarding the potential for the piling and underground cables to impact on land drainage and flooding? How might any issues be resolved?</p>	<p>a) <u>Construction Phase</u></p> <p>As set out in Chapter 8 (Water Resources and Flood Risk) of the ES [APP-143] and the Flood Risk Assessment [AS-014], the Applicant considers that flood risk off-site will not be increased as a result of the Proposed Development. Land drains are designed to speed up the transport of infiltrated surface water from agricultural fields to watercourses, and any damage to land drains would reduce peak run-off rates to watercourses. During construction of the Proposed Development, piling of solar panel mounts and / or installing underground electrical cabling via trenching may result in disturbance or damage to existing land drains. Where this occurs and creates an unacceptable surface drainage issue, SuDS and other measures such as repairing or installing new land drains would be available to rectify such drainage issue. The use of SuDS or land drains to rectify construction-related surface drainage issues is detailed and secured in the Outline CEMP (Paragraph 2.6.9) and Requirement 9 (construction environmental management plans) in the draft DCO.</p> <p>Once the Proposed Development is operational, the drainage on-site will be monitored and drainage measures altered or improved, as necessary. New impacts are unlikely once the construction process is complete and the Proposed Development is fully implemented.</p> <p>Mitigation measures are also proposed in the Outline CEMP to minimise any impacts of the Proposed Development on agricultural land, such as managing impacts on the soils to protect the ability for the land to be returned to an appropriate condition following decommissioning. The management of soil during decommissioning is also captured in the Outline Decommissioning Environmental Management Plan (DEMP).</p> <p><u>Operational Phase</u></p> <p>During the operational life of the Proposed Development, any surface drainage issues arising from piling of solar panel mounts and trenching to install underground electrical cabling would have been monitored and mitigated as described above.</p> <p>Section 4.2 of the Outline OEMP provides further detail on the mitigation measures and monitoring requirements in relation to flood risk, drainage and surface water. This will include regularly cleaning and maintenance of the drainage systems to ensure their function. This is set out on more detail in Appendix 8.1 FRA and Outline Drainage Strategy. Examples include:</p> <ul style="list-style-type: none"> <li>- Removing debris, silt accumulation and leaves to avoid blockages;</li> <li>- Removal or control of tree roots were encroaching on infrastructure;</li> <li>- Replace damaged or failed pipes/gullies/manholes; and / or</li> <li>- Inspect permeable paving for weed growth.</li> </ul>

			<p>The Applicant reiterates that during operation of the Proposed Development, surface water would percolate directly to the ground, and this would be intercepted by vegetation beneath the solar panels and the infiltration reflects that of the greenfield situation. The ground beneath the solar panels would be permanently vegetated whereas with the existing agricultural use, there are periods of bare and compacted earth which increase levels of the surface water runoff. Therefore, flood risk during operation, will not be increased as a result of the Proposed Development.</p> <p><u>Decommissioning Phase</u></p> <p>For the decommissioning phase of the Proposed Development, the Applicant has set out in response to ExQ2 Q5.2 the provision of drainage and flood risk assessment as a key consideration in preparing the final DEMP in cooperation with the LPAs, as secured via Requirement 22 (decommissioning and restoration) of the dDCO and set out in the revised Outline DEMP (Paragraph 3.1.9) submitted at Deadline 4. This will ensure necessary measures are implemented to allow the land to return to agricultural use following decommissioning.</p> <p>b) No response required.</p>
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13. Other planning topics			
13.1	Applicant	<p><u>Air Quality – Air Quality Management Areas (AQMA)</u></p> <p>Paragraph 5.2.12 of NPS EN-1 states that where a Proposed Development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a non-compliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan/strategy at the time of the decision, the Applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached. Paragraph 5.2.19 states that consent should be refused if a project will lead to non-compliance with a statutory limit, objective, or target.</p> <p>The Applicant [REP1-025 response to question 13.1] refers to <a href="#">East Staffordshire Borough Council's Air Quality Report for 2023</a>, which includes that no exceedances of the Nitrogen Dioxide (NO<sub>2</sub>) objective have occurred for the past three years. It says that there are no non-compliant areas through which traffic associated with the Proposed Development would route. The Applicant says that it will seek to discuss this with East Staffordshire Borough Council.</p> <p>Please could the Applicant provide an update on its discussions with East Staffordshire Borough Council, including in relation to compliance with paragraphs 5.2.12 and 5.2.19 of NPS EN-1?</p>	<p>The Applicant notes that East Staffordshire Borough Council did not provide a response to ExQ1- 13.1 and the Applicant's position remains as set out in its response to Question 13.1 [REP1-0205], with the OCTMP having been amended at Deadline 4 to provide further clarity on the routing of construction vehicles. The Applicant is seeking a response from ESBC on this matter and will provide an update at Deadline 5.</p>
13.2	Applicant	<p><u>Aviation and Defence</u></p> <p>Paragraph 5.5.37 of NPS EN-1 states that an assessment of potential effects should be set out where the Proposed Development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets. Paragraph 5.5.39 says that the Applicant should consult the MOD, Met Office, Civil Aviation Authority, NATS and any aerodrome – licensed or otherwise – likely to be affected by the Proposed</p>	<p>a) Tatenhill Airfield is a licensed aerodrome located approximately 8.8 km from the Proposed Development meaning it does fall within the 10 km study area.</p> <p>Modelling of Tantenhill Airfield was scoped out of this assessment due to its location north of the solar panels associated with the Proposed Development, meaning that solar reflections are unlikely to be geometrically possible. If solar reflections are geometrically possible, they are predicted to be acceptable in accordance with industry best practice.</p>

		<p>Development in preparing an assessment of the proposal on aviation, meteorological or other defence interests.</p> <p>The Applicant [REP1-025 response to question 13.3] says that ES Chapter 14 [APP-167] notes that there are no licensed aerodromes within 20km of the site, with some non-licensed aerodromes present within 10km. The Applicant also advises that it has not consulted with the parties identified in paragraph 5.5.39 of NPS EN-1 as no aerodrome is identified as being likely to be affected by the Proposed Development.</p> <p>Paragraph 4.2.2 of ES Appendix 14.1 [APP-166] identifies the unlicensed Grangewood Airfield approximately 4.4km from the Proposed Development. Section 7.2 provides details of three further unlicensed aerodromes and one licensed aerodrome (Tatenhill Airfield) within 10km of the Proposed Development. Section 7.3 says that any solar reflections experienced by pilots at the aerodromes would have intensities no greater than “<i>low potential for temporary after image</i>”, which the Applicant considers acceptable according to guidance and best practice.</p> <p>Paragraph 4.2.2 of ES Appendix 14.1 [APP-166] says that Grangewood Airfield is a general aviation airfield where aviation activity is dynamic and does not necessarily follow the typical approaches / flight paths of a larger licensed aerodrome or airport, but that it is possible to assess the most frequently flown flight paths and the most critical stages of flight.</p> <p>Paragraph 6.2.2 of ES Appendix 14.1 [APP-166] states that “<i>where the solar reflections are not considered significant, a low impact is predicted, and mitigation is not recommended; however, consultation with the aerodrome is recommended to understand their position along with any feedback or comments regarding the proposed development</i>”.</p> <ul style="list-style-type: none"> <li>a) Please could the Applicant update ES Chapter 14 [APP-167] or ES Appendix 14.1 [APP-166] to ensure that they are consistent in relation to licensed aerodromes within 20km of the site?</li> <li>b) Please could the Applicant set out how it has identified the most frequently flown flight paths and the most critical stages of flight for Grangewood Airfield and how the assessment can be considered robust?</li> <li>c) Please could the Applicant explain why it has not followed the recommendation of its specialist to consult with the aerodromes where a low impact is predicted and when aviation activity at those aerodromes is dynamic or the aerodrome is licensed? Is such consultation necessary for the Applicant’s assessment to be suitably robust and precautionary?</li> </ul>	<p>Section 7.2 of ES Appendix 14.1 has been updated to reflect that position, to ensure there is consistency between that Appendix and ES Chapter 14.</p> <ul style="list-style-type: none"> <li>b) The assessment has considered the final sections of standard general aviation circuits and final mile approaches to the airfield. These are the standard receptors that are assessed unless specific circuit dimensions are found. The intention of using that methodology, which is an industry standard approach, is to capture the most critical stages of flight rather than to assess all potential stages of flight. These receptors have been discussed with the CAA Airfield Advisory Team and go beyond assessing the typical 2-mile approach paths, which is more suited to licensed aerodromes. Section 4.2.2 of ES Chapter 14 has been updated at Deadline 4 to state the above.</li> <li>c) ES Appendix 14.1 has been amended generally to reflect the fact that report contains a number of statements which summarise the position taken by relevant guidance and which therefore set out the approach in general to the assessment of glint and glare in respect of aviation receptors and are not statements which therefore apply directly to the Proposed Development.</li> </ul> <p>In the case of Paragraph 6.2.2 of ES Appendix 14.1, the recommendation for consultation text that has been quoted is based on the low impact significance being determined following ‘potential for temporary after-image’ being identified and consideration of mitigating factors. If a ‘low potential for temporary after-image’ is predicted, as it is for the aerodromes in question, (i.e. Grangewood Airfield, Sittles Farm Airstrip, Fisherwick Airfield, Streethay Farm Airstrip, and Tatenhill Airfield) then the glare adheres to industry best practice guidelines, and the Applicant’s specialist would not recommend consultation. The Applicant therefore does not consider that consultation is necessary for the assessment to be suitably robust and precautionary in this case.</p>
13.3	Applicant DCC SDDC	<p><u>Cumulative effects</u></p> <p>DCC [REP2-001] and SDDC [REP2-001] refer to general concerns regarding cumulative impacts in relation to the number of developments coming forward in the surrounding area.</p> <p>The Applicant [REP3-033] says that it uses a list of developments agreed with the DCC and SDDC and that it is reviewing the cumulative developments with a view of updating the list in agreement with DCC and SDDC through the SoCG.</p> <ul style="list-style-type: none"> <li>a) Please could the Applicant provide a draft copy of the SoCG with DCC and SDDC at Deadline 4, and set out the cumulative effects matters yet to be agreed with DCC and SDDC, the next steps to be taken to address them?</li> </ul>	<ul style="list-style-type: none"> <li>a) The Applicant is continuing to engage with SDDC and DCC regarding cumulative developments and has noted additional potential cumulative projects identified by the local planning authorities and Interested Parties in their submissions at earlier deadlines.</li> </ul> <p>As set out in the Applicant’s Statements of Common Ground (SoCG)– Status Document, the Applicant has provided a substantive update as to the position of the SoCG between it and the local planning authorities at Deadline 4. The Applicant is seeking to provide a further update in early October 2024 and will include within that a further update on cumulative projects. The Applicant is working on the basis that it will be able to agree a position on cumulative projects and the assessment of those with the local planning authorities before the end of the Examination.</p>

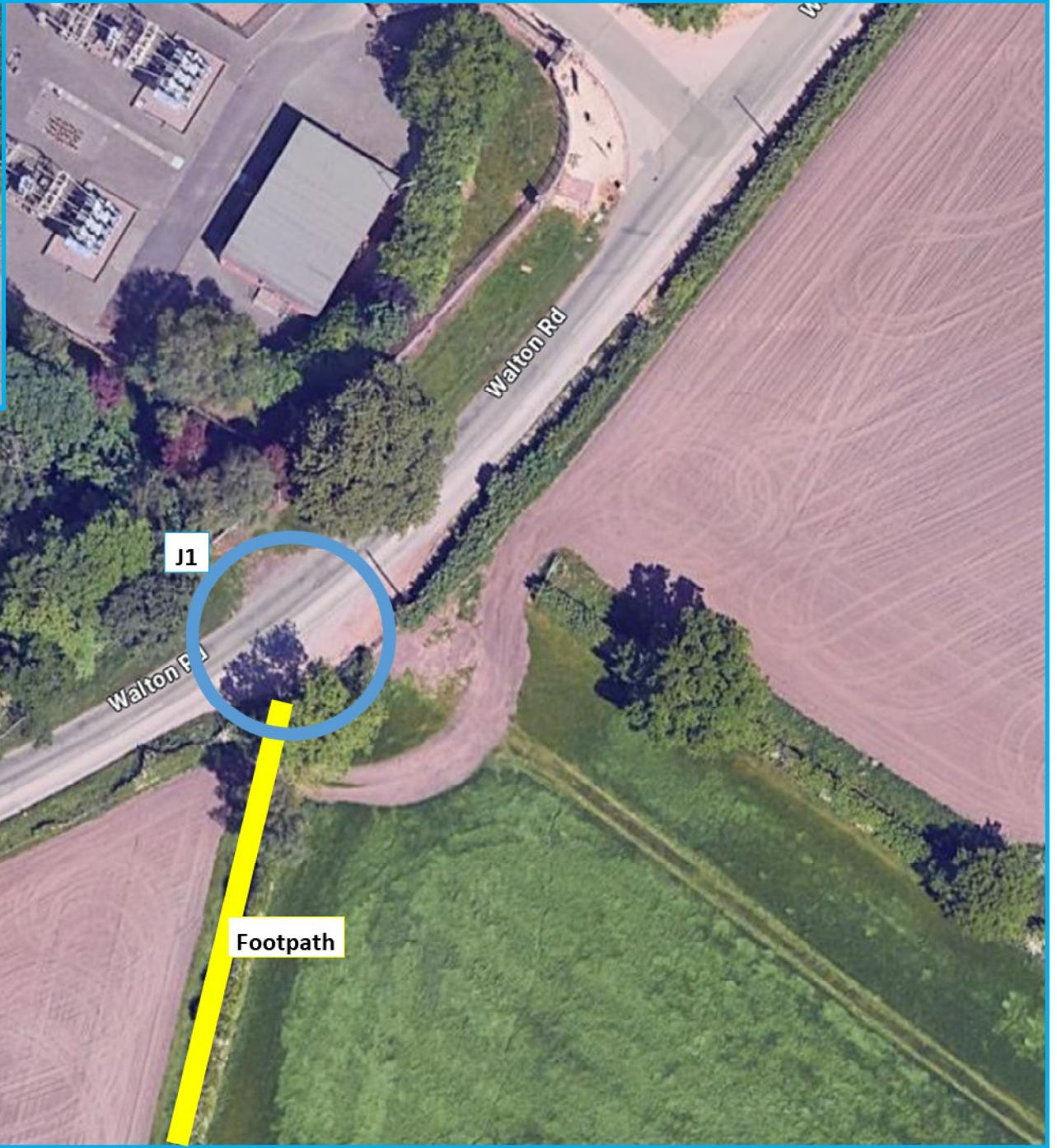
		<p>b) Please could the Applicant submit any updates required to relevant chapters of the ES, ensuring that they include consideration of any cumulative developments added to the list?</p> <p>c) Please could DCC and SDDC set out any remaining cumulative effect concerns, including in relation to any other specific development or any specific planning issue, at Deadlines 4 and 5. How might their issues be resolved?</p>	<p>b) The Applicant does not consider any amendments to the ES are required at this time..</p> <p>c) No response required.</p>
13.4	Applicant EA DCC SDDC	<p><u>BESS fire risk and related emergency response and pollution</u></p> <p>Section 5.6 of the Outline BSMP [APP-093] identifies an additional risk of causing environmental harm from discharge of contaminated water. It says that to prevent this, there would be a drainage system installed around the BESS compound and substation area that will either drain to an underground tank or SuDS pond with shut-off and separating capabilities for containment and testing of water prior to discharge or removal. Paragraph 5.4.7 of the Outline OEMP [REP1-009] refers to the production of an Emergency Response Plan in consultation with Derbyshire Fire and Rescue.</p> <p>DCC [REP2-001] and SDDC [REP2-001] consider that there is a significant risk that the battery storage fire suppression system would fail, resulting in a major incident requiring a disaster response with the use of water to extinguish the battery fires and thereafter their cooling. Given the presence of the aquifers on site, any spent firewater would be likely to be contaminated and hazardous and would need to be contained to avoid any significant environmental impacts, including to aquifers. They note that emergency calls to the fire service locally are directed to Staffordshire and that in an emergency, fire crews are required to cross the River Trent, which can result in some delay in attending incidents and reducing the potential to limit a damaging environmental incident.</p> <p>The EA [AS-019, REP1-033, REP3-001] consider that the pollution risks of emergency response have not been appropriately assessed and that if the firewater isn't adequately controlled this could result in significant pollution risks and cause detrimental impact to the environment. It says that the Applicant should confirm that the flow control valves would close automatically if a fire were detected by the detection system and include any relevant routine maintenance required, to ensure this system remains functional, within the Outline Drainage Strategy.</p> <p>The Applicant [REP1-023, REP3-033] says that the BESS would be set within a bunded slab which drains to a pollution-controlled attenuation tank to contain any contaminated water in the event of a fire. All rainwater landing on those impermeable areas would be collected and directed to underground tanks, which have been sized to account for larger storm events, with additional contingency for climate change. The tanks would be fitted with a hydrobrake which would manage the flow of water out to the existing watercourse to the north, near Rosliston Road at existing greenfield run-off rates. The tanks would be fitted with automatic control valves which would close in the event of any incident with the BESS or substation and any water contained in order to allow the water to be tested for contaminants and if necessary pumped into a tanker to be taken away from the Site for proper disposal. The Applicant says that the Outline BSMP [APP-093] provides further details on the procedure for dealing with potential contamination issues. It also states that design parameters for the BESS include measures which reduce the risk of fire from the batteries, by providing appropriate spacing between the battery units to mitigate fire spreading between battery units and through locating the BESS in the centre of the Site, away from residential properties. It says that the final BSMP would sit alongside an emergency response plan and provide details of in-built BESS safety features like internal fire suppression systems built into individual battery units, automatic detection and alert systems, remote shut-down, and procedures to alert local emergency services in line with agreed fire-fighting strategy.</p>	<p>a) No response required.</p> <p>b) The Applicant maintains the position set out in REP1-023 and REP3-033 and will respond to any submissions received at D4 in relation to ExQ2 Q13.4 if considered necessary.</p>

		<p>a) Please could the EA, DCC and SDDC set out any remaining concerns in relation to BESS, fire risk and related emergency response and pollution, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</p> <p>b) Please could the Applicant comment?</p>	
13.5	Applicant	<p><u>Socio-economics</u></p> <p>The Applicant [APP-163, REP1-023] refers to measures in relation to the local sourcing of equipment and contractors.</p> <p>a) Please could this mitigation be secured in the Outline OEMP [REP1-009] to at least the same level of detail as set out in the ES?</p> <p>The Applicant [APP-163, REP3-033], DCC [REP2-001] and SDDC [REP2-001] refer to the provision of educational resources. Paragraph 2.10.5 of the Outline CEMP [REP1-007] states that a resource could be provided.</p> <p>b) Is the provision of educational resources considered to be relevant to planning? If so, is the detail agreed with DCC and SDDC and can the detail be provided in the relevant outline management plan(s) to improve precision, and in a manner that is firmly secured (avoiding terms such as “could be”)?</p> <p>c) Should a firm commitment be included in the Outline OEMP [REP1-009] together with an undertaking to maintain them throughout the operation stage?</p>	<p>a) The Applicant has updated the Outline OEMP to include a commitment to local sourcing of equipment and contractors (Paragraphs 3.4.13 and 3.4.14), where practicable. This is included in the same level of detail as Paragraph 12.76 of ES Chapter 12 [APP-163] and Response P-63 in the Applicant's Response to Relevant Representations at Deadline 1 [REP1-023].</p> <p>b) The provision of educational resources is not considered relevant to planning. Although referenced in ES Chapter 12 [APP-163], as an enhancement alongside the proposed community benefit fund, the provision of education opportunities for the local community was not taken into account in the assessment of operational effects of the Proposed Development.</p> <p>c) Paragraph 4.7.4 of the Outline OEMP includes a commitment to the provision of educational resources. The detail of what this will entail will be agreed with the Local Planning Authority in the final OEMP, required to discharge Requirement 11 (operational environmental management plan) of the dDCO.</p>
13.6	Applicant EA	<p><u>Waste Management Strategy</u></p> <p>The EA [REP1-033, REP3-001] says that the Waste Management Strategy is yet to be agreed with the Applicant.</p> <p>a) Please could the Applicant set out how the strategy is secured for the construction, operation, and decommissioning stages, including how the final strategy would be consulted on and approved? Please could the measures for each stage be included in the Outline CEMP [REP1-007], Outline OEMP [REP1-009], and Outline DEMP [REP1-011]?</p> <p>b) Please could the Applicant provide a draft copy of the SoCG with EA at Deadline 4, and ensure that it sets out the waste management matters yet to be agreed with EA, and the next steps to be taken to address them?</p> <p>c) Please could EA set out any remaining waste management concerns at Deadlines 4 and 5, summarise any related discussions with the Applicant, and suggest how their issues might be resolved?</p>	<p>a) The Waste Management Strategy is secured as follows:</p> <ul style="list-style-type: none"> <li>• Construction – Section 2.5 of the Outline CEMP, secured by dDCO Requirement 9 (construction environmental management plans). The discharge of Requirement 9 must be approved by the Local Planning Authority (LPA), in consultation with the Environment Agency.</li> <li>• Operation – Section 4.8 of the Outline OEMP, secured by dDCO Requirement 11 (operational environmental management plan). The discharge of Requirement 11 must be approved by the LPA.</li> <li>• Decommissioning – Section 3.4 of the Outline DEMP, secured by dDCO Requirement 22. The discharge of Requirement 22 (decommissioning and restoration) must be approved by the LPA.</li> </ul> <p>b) The EA has provided the Applicant with its submissions at Deadline 4 ahead of the deadline. The Work Package Tracker submitted at Deadline 4 confirms that waste matters, including the Waste Management Strategy, have been agreed by the EA.</p> <p>c) The EA has provided the Applicant a copy of their D4 responses on 30<sup>th</sup> September 2024. The EA has no remaining concerns regarding the waste management strategy.</p>

END



**Appendix A**  
**Non Motorised Users Survey Results**



TIME	Left to Footpath				Ahead to Walton Road (W)			
	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL
00:00-00:15	0	0	0	0	0	0	0	0
00:15-00:30	0	0	0	0	0	0	0	0
00:30-00:45	0	0	0	0	0	0	0	0
00:45-01:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
01:00-01:15	0	0	0	0	0	0	0	0
01:15-01:30	0	0	0	0	0	0	0	0
01:30-01:45	0	0	0	0	0	0	0	0
01:45-02:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
02:00-02:15	0	0	0	0	0	0	0	0
02:15-02:30	0	0	0	0	0	0	0	0
02:30-02:45	0	0	0	0	0	0	0	0
02:45-03:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
03:00-03:15	0	0	0	0	0	0	0	0
03:15-03:30	0	0	0	0	0	0	0	0
03:30-03:45	0	0	0	0	0	0	0	0
03:45-04:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
04:00-04:15	0	0	0	0	0	0	0	0
04:15-04:30	0	0	0	0	0	0	0	0
04:30-04:45	0	0	0	0	0	0	0	0
04:45-05:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
05:00-05:15	0	0	0	0	0	0	0	0
05:15-05:30	0	0	0	0	0	0	0	0
05:30-05:45	0	0	0	0	0	0	0	0
05:45-06:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
06:00-06:15	0	0	0	0	0	0	0	0
06:15-06:30	0	0	0	0	0	0	0	0
06:30-06:45	0	0	0	0	0	0	0	0
06:45-07:00	0	0	0	0	0	1	0	1
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
07:00-07:15	0	0	0	0	0	0	0	0
07:15-07:30	0	0	0	0	0	0	0	0
07:30-07:45	0	0	0	0	0	1	0	1
07:45-08:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
08:00-08:15	0	0	0	0	0	0	0	0
08:15-08:30	0	0	0	0	0	0	0	0
08:30-08:45	0	0	0	0	0	0	0	0
08:45-09:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
09:00-09:15	0	0	0	0	0	2	0	2
09:15-09:30	0	0	0	0	0	0	0	0
09:30-09:45	0	0	0	0	0	1	0	1
09:45-10:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>
10:00-10:15	0	0	0	0	0	0	0	0
10:15-10:30	0	0	0	0	0	0	0	0
10:30-10:45	0	0	0	0	0	0	0	0
10:45-11:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
11:00-11:15	0	0	0	0	0	0	0	0
11:15-11:30	0	0	0	0	0	1	0	1
11:30-11:45	0	0	0	0	0	1	0	1
11:45-12:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>
12:00-12:15	0	0	0	0	0	0	0	0
12:15-12:30	0	0	0	0	0	0	0	0
12:30-12:45	0	0	0	0	0	0	0	0
12:45-13:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
13:00-13:15	0	0	0	0	0	0	0	0
13:15-13:30	0	0	0	0	0	0	0	0
13:30-13:45	0	0	0	0	0	0	0	0
13:45-14:00	0	0	0	0	0	2	0	2
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>
14:00-14:15	0	0	0	0	0	0	0	0
14:15-14:30	0	0	0	0	0	0	0	0
14:30-14:45	0	0	0	0	0	0	0	0
14:45-15:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
15:00-15:15	0	0	0	0	0	0	0	0
15:15-15:30	0	0	0	0	0	0	0	0
15:30-15:45	0	0	0	0	0	1	0	1
15:45-16:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
16:00-16:15	0	0	0	0	0	0	0	0
16:15-16:30	0	0	0	0	0	0	0	0
16:30-16:45	0	0	0	0	0	0	0	0
16:45-17:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
17:00-17:15	0	0	0	0	0	0	0	0
17:15-17:30	0	0	0	0	0	2	0	2
17:30-17:45	0	0	0	0	0	0	0	0
17:45-18:00	0	0	0	0	0	1	0	1
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>
18:00-18:15	0	0	0	0	0	1	0	1
18:15-18:30	0	0	0	0	0	0	0	0
18:30-18:45	0	0	0	0	0	0	0	0
18:45-19:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
19:00-19:15	0	0	0	0	0	0	0	0
19:15-19:30	0	0	0	0	0	1	0	1
19:30-19:45	0	0	0	0	0	0	0	0
19:45-20:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
20:00-20:15	0	0	0	0	0	0	0	0
20:15-20:30	0	0	0	0	0	0	0	0
20:30-20:45	0	0	0	0	0	0	0	0
20:45-21:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
21:00-21:15	0	0	0	0	0	0	0	0
21:15-21:30	0	0	0	0	0	0	0	0
21:30-21:45	0	0	0	0	0	0	0	0
21:45-22:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
22:00-22:15	0	0	0	0	0	0	0	0
22:15-22:30	0	0	0	0	0	0	0	0
22:30-22:45	0	0	0	0	0	0	0	0
22:45-23:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
23:00-23:15	0	0	0	0	0	0	0	0
23:15-23:30	0	0	0	0	0	0	0	0
23:30-23:45	0	0	0	0	0	0	0	0
23:45-00:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>15</b>	<b>0</b>	<b>15</b>



Derbyshire NLU  
Thursday 29th August 2024  
Site: 1  
Approach: Walton Road West

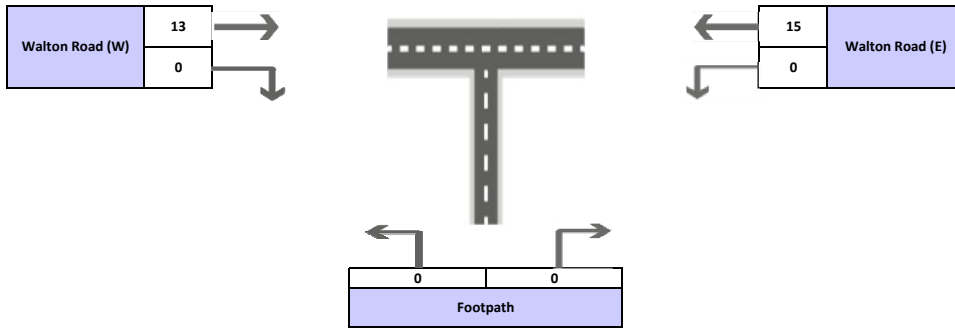
TIME	Ahead to Walton Road (E)				Right to Footpath			
	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL
00:00-00:15	0	0	0	0	0	0	0	0
00:15-00:30	0	0	0	0	0	0	0	0
00:30-00:45	0	0	0	0	0	0	0	0
00:45-01:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
01:00-01:15	0	0	0	0	0	0	0	0
01:15-01:30	0	0	0	0	0	0	0	0
01:30-01:45	0	0	0	0	0	0	0	0
01:45-02:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
02:00-02:15	0	0	0	0	0	0	0	0
02:15-02:30	0	0	0	0	0	0	0	0
02:30-02:45	0	0	0	0	0	0	0	0
02:45-03:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
03:00-03:15	0	0	0	0	0	0	0	0
03:15-03:30	0	0	0	0	0	0	0	0
03:30-03:45	0	0	0	0	0	0	0	0
03:45-04:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
04:00-04:15	0	0	0	0	0	0	0	0
04:15-04:30	0	0	0	0	0	0	0	0
04:30-04:45	0	0	0	0	0	0	0	0
04:45-05:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
05:00-05:15	0	0	0	0	0	0	0	0
05:15-05:30	0	0	0	0	0	0	0	0
05:30-05:45	0	0	0	0	0	0	0	0
05:45-06:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
06:00-06:15	0	0	0	0	0	0	0	0
06:15-06:30	0	0	0	0	0	0	0	0
06:30-06:45	0	0	0	0	0	0	0	0
06:45-07:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
07:00-07:15	0	0	0	0	0	0	0	0
07:15-07:30	0	0	0	0	0	0	0	0
07:30-07:45	0	0	0	0	0	0	0	0
07:45-08:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
08:00-08:15	0	0	0	0	0	0	0	0
08:15-08:30	0	0	0	0	0	0	0	0
08:30-08:45	0	0	0	0	0	0	0	0
08:45-09:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
09:00-09:15	0	0	0	0	0	0	0	0
09:15-09:30	0	1	0	1	0	0	0	0
09:30-09:45	0	0	0	0	0	0	0	0
09:45-10:00	0	1	0	1	0	0	0	0
Hourly Total	0	2	0	2	0	0	0	0
10:00-10:15	0	0	0	0	0	0	0	0
10:15-10:30	0	0	0	0	0	0	0	0
10:30-10:45	0	0	0	0	0	0	0	0
10:45-11:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
11:00-11:15	0	0	0	0	0	0	0	0
11:15-11:30	0	0	0	0	0	0	0	0
11:30-11:45	0	0	0	0	0	0	0	0
11:45-12:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
12:00-12:15	0	0	0	0	0	0	0	0
12:15-12:30	0	0	0	0	0	0	0	0
12:30-12:45	0	0	0	0	0	0	0	0
12:45-13:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
13:00-13:15	0	0	0	0	0	0	0	0
13:15-13:30	0	1	0	1	0	0	0	0
13:30-13:45	0	0	0	0	0	0	0	0
13:45-14:00	0	0	0	0	0	0	0	0
Hourly Total	0	1	0	1	0	0	0	0
14:00-14:15	0	0	0	0	0	0	0	0
14:15-14:30	0	0	0	0	0	0	0	0
14:30-14:45	0	0	0	0	0	0	0	0
14:45-15:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
15:00-15:15	0	1	0	1	0	0	0	0
15:15-15:30	0	0	0	0	0	0	0	0
15:30-15:45	0	0	0	0	0	0	0	0
15:45-16:00	0	1	0	1	0	0	0	0
Hourly Total	0	2	0	2	0	0	0	0
16:00-16:15	0	1	0	1	0	0	0	0
16:15-16:30	0	1	0	1	0	0	0	0
16:30-16:45	0	1	0	1	0	0	0	0
16:45-17:00	0	0	0	0	0	0	0	0
Hourly Total	0	2	0	2	0	0	0	0
17:00-17:15	0	1	0	1	0	0	0	0
17:15-17:30	0	0	0	0	0	0	0	0
17:30-17:45	0	0	0	0	0	0	0	0
17:45-18:00	0	0	0	0	0	0	0	0
Hourly Total	0	1	0	1	0	0	0	0
18:00-18:15	0	0	0	0	0	0	0	0
18:15-18:30	0	0	0	0	0	0	0	0
18:30-18:45	0	0	0	0	0	0	0	0
18:45-19:00	0	2	0	2	0	0	0	0
Hourly Total	0	2	0	2	0	0	0	0
19:00-19:15	0	0	0	0	0	0	0	0
19:15-19:30	0	1	0	1	0	0	0	0
19:30-19:45	0	0	0	0	0	0	0	0
19:45-20:00	0	2	0	2	0	0	0	0
Hourly Total	0	3	0	3	0	0	0	0
20:00-20:15	0	0	0	0	0	0	0	0
20:15-20:30	0	0	0	0	0	0	0	0
20:30-20:45	0	0	0	0	0	0	0	0
20:45-21:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
21:00-21:15	0	0	0	0	0	0	0	0
21:15-21:30	0	0	0	0	0	0	0	0
21:30-21:45	0	0	0	0	0	0	0	0
21:45-22:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
22:00-22:15	0	0	0	0	0	0	0	0
22:15-22:30	0	0	0	0	0	0	0	0
22:30-22:45	0	0	0	0	0	0	0	0
22:45-23:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
23:00-23:15	0	0	0	0	0	0	0	0
23:15-23:30	0	0	0	0	0	0	0	0
23:30-23:45	0	0	0	0	0	0	0	0
23:45-00:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

From: 1) 00:00  Show Peak Hour:

To: 1) 00:00

Class: All Vehicles

Thursday 29th August 2024



Derbyshire NMU  
Tuesday 27th August 2024  
Site: 1  
Approach: Walton Road East

TIME	Left to Footpath				Ahead to Walton Road (W)			
	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL
00:00 - 00:15	0	0	0	0	0	0	0	0
00:15 - 00:30	0	0	0	0	0	0	0	0
00:30 - 00:45	0	0	0	0	0	0	0	0
00:45 - 01:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
01:00 - 01:15	0	0	0	0	0	0	0	0
01:15 - 01:30	0	0	0	0	0	0	0	0
01:30 - 01:45	0	0	0	0	0	0	0	0
01:45 - 02:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
02:00 - 02:15	0	0	0	0	0	0	0	0
02:15 - 02:30	0	0	0	0	0	0	0	0
02:30 - 02:45	0	0	0	0	0	0	0	0
02:45 - 03:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
03:00 - 03:15	0	0	0	0	0	0	0	0
03:15 - 03:30	0	0	0	0	0	0	0	0
03:30 - 03:45	0	0	0	0	0	0	0	0
03:45 - 04:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
04:00 - 04:15	0	0	0	0	0	0	0	0
04:15 - 04:30	0	0	0	0	0	0	0	0
04:30 - 04:45	0	0	0	0	0	0	0	0
04:45 - 05:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
05:00 - 05:15	0	0	0	0	0	0	0	0
05:15 - 05:30	0	0	0	0	0	0	0	0
05:30 - 05:45	0	0	0	0	0	0	0	0
05:45 - 06:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
06:00 - 06:15	0	0	0	0	0	0	0	0
06:15 - 06:30	0	0	0	0	0	0	0	0
06:30 - 06:45	0	0	0	0	0	1	0	1
06:45 - 07:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	1	0	1
07:00 - 07:15	0	0	0	0	0	0	0	0
07:15 - 07:30	0	0	0	0	0	0	0	0
07:30 - 07:45	0	0	0	0	0	1	0	1
07:45 - 08:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	1	0	1
08:00 - 08:15	0	0	0	0	0	1	0	1
08:15 - 08:30	0	0	0	0	0	0	0	0
08:30 - 08:45	0	0	0	0	0	0	0	0
08:45 - 09:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	1	0	1
09:00 - 09:15	0	0	0	0	0	0	0	0
09:15 - 09:30	0	0	0	0	0	0	0	0
09:30 - 09:45	0	0	0	0	0	0	0	0
09:45 - 10:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
10:00 - 10:15	0	0	0	0	0	0	0	0
10:15 - 10:30	0	0	0	0	0	1	0	1
10:30 - 10:45	0	0	0	0	0	0	0	0
10:45 - 11:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	1	0	1
11:00 - 11:15	0	0	0	0	0	0	0	0
11:15 - 11:30	0	0	0	0	0	0	0	0
11:30 - 11:45	0	0	0	0	0	0	0	0
11:45 - 12:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
12:00 - 12:15	0	0	0	0	0	0	0	0
12:15 - 12:30	0	0	0	0	0	0	0	0
12:30 - 12:45	0	0	0	0	0	0	0	0
12:45 - 13:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
13:00 - 13:15	0	0	0	0	0	0	0	0
13:15 - 13:30	0	0	0	0	0	0	0	0
13:30 - 13:45	0	0	0	0	0	0	0	0
13:45 - 14:00	0	0	0	0	0	2	0	2
Hourly Total	0	0	0	0	0	2	0	2
14:00 - 14:15	0	0	0	0	0	0	0	0
14:15 - 14:30	0	0	0	0	0	0	0	0
14:30 - 14:45	0	0	0	0	0	0	0	0
14:45 - 15:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
15:00 - 15:15	0	0	0	0	0	0	0	0
15:15 - 15:30	0	0	0	0	0	1	0	1
15:30 - 15:45	0	0	0	0	0	0	0	0
15:45 - 16:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	1	0	1
16:00 - 16:15	0	0	0	0	0	0	0	0
16:15 - 16:30	0	0	0	0	0	0	0	0
16:30 - 16:45	0	0	0	0	0	0	0	0
16:45 - 17:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
17:00 - 17:15	0	0	0	0	0	0	0	0
17:15 - 17:30	0	0	0	0	0	0	0	0
17:30 - 17:45	0	0	0	0	0	0	0	0
17:45 - 18:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
18:00 - 18:15	0	0	0	0	0	0	0	0
18:15 - 18:30	0	0	0	0	0	0	0	0
18:30 - 18:45	0	0	0	0	0	0	0	0
18:45 - 19:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
19:00 - 19:15	0	0	0	0	0	0	0	0
19:15 - 19:30	0	0	0	0	0	0	0	0
19:30 - 19:45	0	0	0	0	0	0	0	0
19:45 - 20:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
20:00 - 20:15	0	0	0	0	0	0	0	0
20:15 - 20:30	0	0	0	0	0	0	0	0
20:30 - 20:45	0	0	0	0	0	0	0	0
20:45 - 21:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
21:00 - 21:15	0	0	0	0	0	0	0	0
21:15 - 21:30	0	0	0	0	0	0	0	0
21:30 - 21:45	0	0	0	0	0	0	0	0
21:45 - 22:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
22:00 - 22:15	0	0	0	0	0	0	0	0
22:15 - 22:30	0	0	0	0	0	0	0	0
22:30 - 22:45	0	0	0	0	0	0	0	0
22:45 - 23:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
23:00 - 23:15	0	0	0	0	0	0	0	0
23:15 - 23:30	0	0	0	0	0	0	0	0
23:30 - 23:45	0	0	0	0	0	0	0	0
23:45 - 00:00	0	0	0	0	0	0	0	0
Hourly Total	0	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>0</b>	<b>7</b>



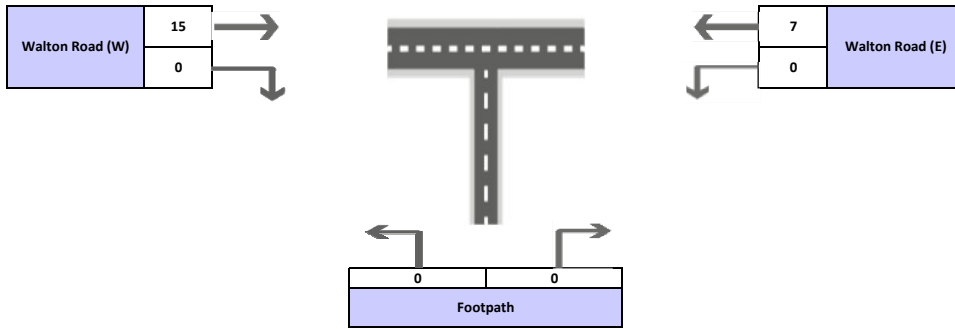


Derbyshire NMU  
 Tuesday 27th August 2024  
 Site: 1  
 Approach: Walton Road West

TIME	Ahead to Walton Road (E)				Right to Footpath			
	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL
00:00 - 00:15	0	0	0	0	0	0	0	0
00:15 - 00:30	0	0	0	0	0	0	0	0
00:30 - 00:45	0	0	0	0	0	0	0	0
00:45 - 01:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
01:00 - 01:15	0	0	0	0	0	0	0	0
01:15 - 01:30	0	0	0	0	0	0	0	0
01:30 - 01:45	0	0	0	0	0	0	0	0
01:45 - 02:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
02:00 - 02:15	0	0	0	0	0	0	0	0
02:15 - 02:30	0	0	0	0	0	0	0	0
02:30 - 02:45	0	0	0	0	0	0	0	0
02:45 - 03:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
03:00 - 03:15	0	0	0	0	0	0	0	0
03:15 - 03:30	0	0	0	0	0	0	0	0
03:30 - 03:45	0	0	0	0	0	0	0	0
03:45 - 04:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
04:00 - 04:15	0	0	0	0	0	0	0	0
04:15 - 04:30	0	0	0	0	0	0	0	0
04:30 - 04:45	0	0	0	0	0	0	0	0
04:45 - 05:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
05:00 - 05:15	0	0	0	0	0	0	0	0
05:15 - 05:30	0	0	0	0	0	0	0	0
05:30 - 05:45	0	0	0	0	0	0	0	0
05:45 - 06:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
06:00 - 06:15	0	0	0	0	0	0	0	0
06:15 - 06:30	0	0	0	0	0	0	0	0
06:30 - 06:45	0	1	0	1	0	0	0	0
06:45 - 07:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
07:00 - 07:15	0	0	0	0	0	0	0	0
07:15 - 07:30	0	0	0	0	0	0	0	0
07:30 - 07:45	0	0	0	0	0	0	0	0
07:45 - 08:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
08:00 - 08:15	0	0	0	0	0	0	0	0
08:15 - 08:30	0	0	0	0	0	0	0	0
08:30 - 08:45	0	0	0	0	0	0	0	0
08:45 - 09:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
09:00 - 09:15	0	0	0	0	0	0	0	0
09:15 - 09:30	0	0	0	0	0	0	0	0
09:30 - 09:45	0	0	0	0	0	0	0	0
09:45 - 10:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
10:00 - 10:15	0	1	0	1	0	0	0	0
10:15 - 10:30	0	1	0	1	0	0	0	0
10:30 - 10:45	0	0	0	0	0	0	0	0
10:45 - 11:00	0	1	0	1	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
11:00 - 11:15	0	0	0	0	0	0	0	0
11:15 - 11:30	0	3	0	3	0	0	0	0
11:30 - 11:45	0	0	0	0	0	0	0	0
11:45 - 12:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
12:00 - 12:15	0	0	0	0	0	0	0	0
12:15 - 12:30	0	1	0	1	0	0	0	0
12:30 - 12:45	0	0	0	0	0	0	0	0
12:45 - 13:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
13:00 - 13:15	0	0	0	0	0	0	0	0
13:15 - 13:30	0	0	0	0	0	0	0	0
13:30 - 13:45	0	0	0	0	0	0	0	0
13:45 - 14:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
14:00 - 14:15	0	0	0	0	0	0	0	0
14:15 - 14:30	0	0	0	0	0	0	0	0
14:30 - 14:45	0	0	0	0	0	0	0	0
14:45 - 15:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
15:00 - 15:15	0	0	0	0	0	0	0	0
15:15 - 15:30	0	0	0	0	0	0	0	0
15:30 - 15:45	0	0	0	0	0	0	0	0
15:45 - 16:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
16:00 - 16:15	0	2	0	2	0	0	0	0
16:15 - 16:30	0	1	0	1	0	0	0	0
16:30 - 16:45	0	0	0	0	0	0	0	0
16:45 - 17:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
17:00 - 17:15	0	0	0	0	0	0	0	0
17:15 - 17:30	0	0	0	0	0	0	0	0
17:30 - 17:45	0	0	0	0	0	0	0	0
17:45 - 18:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
18:00 - 18:15	0	0	0	0	0	0	0	0
18:15 - 18:30	0	2	0	2	0	0	0	0
18:30 - 18:45	0	2	0	2	0	0	0	0
18:45 - 19:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
19:00 - 19:15	0	0	0	0	0	0	0	0
19:15 - 19:30	0	0	0	0	0	0	0	0
19:30 - 19:45	0	0	0	0	0	0	0	0
19:45 - 20:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
20:00 - 20:15	0	0	0	0	0	0	0	0
20:15 - 20:30	0	0	0	0	0	0	0	0
20:30 - 20:45	0	0	0	0	0	0	0	0
20:45 - 21:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
21:00 - 21:15	0	0	0	0	0	0	0	0
21:15 - 21:30	0	0	0	0	0	0	0	0
21:30 - 21:45	0	0	0	0	0	0	0	0
21:45 - 22:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
22:00 - 22:15	0	0	0	0	0	0	0	0
22:15 - 22:30	0	0	0	0	0	0	0	0
22:30 - 22:45	0	0	0	0	0	0	0	0
22:45 - 23:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
23:00 - 23:15	0	0	0	0	0	0	0	0
23:15 - 23:30	0	0	0	0	0	0	0	0
23:30 - 23:45	0	0	0	0	0	0	0	0
23:45 - 00:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>0</b>	<b>15</b>	<b>0</b>	<b>15</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

From: 1) 00:00  Show Peak Hour:  
To: 1) 00:00  
Class: All Vehicles

Tuesday 27th August 2024



Derbyshire NMU  
 Wednesday 28th August 2024  
 Site: 1  
 Approach: Walton Road East

TIME	Left to Footpath			TOTAL	Ahead to Walton Road (W)			TOTAL
	PEDESTRIAN	CYCLE	EQUESTRIAN		PEDESTRIAN	CYCLE	EQUESTRIAN	
00:00 - 00:15	0	0	0	0	0	0	0	0
00:15 - 00:30	0	0	0	0	0	0	0	0
00:30 - 00:45	0	0	0	0	0	0	0	0
00:45 - 01:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
01:00 - 01:15	0	0	0	0	0	0	0	0
01:15 - 01:30	0	0	0	0	0	0	0	0
01:30 - 01:45	0	0	0	0	0	0	0	0
01:45 - 02:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
02:00 - 02:15	0	0	0	0	0	0	0	0
02:15 - 02:30	0	0	0	0	0	0	0	0
02:30 - 02:45	0	0	0	0	0	0	0	0
02:45 - 03:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
03:00 - 03:15	0	0	0	0	0	0	0	0
03:15 - 03:30	0	0	0	0	0	0	0	0
03:30 - 03:45	0	0	0	0	0	0	0	0
03:45 - 04:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
04:00 - 04:15	0	0	0	0	0	0	0	0
04:15 - 04:30	0	0	0	0	0	0	0	0
04:30 - 04:45	0	0	0	0	0	0	0	0
04:45 - 05:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
05:00 - 05:15	0	0	0	0	0	0	0	0
05:15 - 05:30	0	0	0	0	0	0	0	0
05:30 - 05:45	0	0	0	0	0	0	0	0
05:45 - 06:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
06:00 - 06:15	0	0	0	0	0	0	0	0
06:15 - 06:30	0	0	0	0	0	0	0	0
06:30 - 06:45	0	0	0	0	0	4	0	4
06:45 - 07:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>4</b>
07:00 - 07:15	0	0	0	0	0	1	0	1
07:15 - 07:30	0	0	0	0	0	0	0	0
07:30 - 07:45	0	0	0	0	0	1	0	1
07:45 - 08:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>
08:00 - 08:15	0	0	0	0	0	0	0	0
08:15 - 08:30	0	0	0	0	0	1	0	1
08:30 - 08:45	0	0	0	0	0	0	0	0
08:45 - 09:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
09:00 - 09:15	0	0	0	0	0	0	0	0
09:15 - 09:30	0	0	0	0	0	0	0	0
09:30 - 09:45	0	0	0	0	0	0	0	0
09:45 - 10:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
10:00 - 10:15	0	0	0	0	0	1	0	1
10:15 - 10:30	0	0	0	0	0	0	0	0
10:30 - 10:45	0	0	0	0	0	0	0	0
10:45 - 11:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
11:00 - 11:15	0	0	0	0	0	1	0	1
11:15 - 11:30	0	0	0	0	0	2	0	2
11:30 - 11:45	0	0	0	0	2	0	0	2
11:45 - 12:00	0	0	0	0	0	1	0	1
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>4</b>	<b>0</b>	<b>6</b>
12:00 - 12:15	0	0	0	0	0	1	0	1
12:15 - 12:30	0	0	0	0	0	0	0	0
12:30 - 12:45	0	0	0	0	0	0	0	0
12:45 - 13:00	0	0	0	0	0	1	0	1
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>
13:00 - 13:15	0	0	0	0	0	1	0	1
13:15 - 13:30	0	0	0	0	0	0	0	0
13:30 - 13:45	0	0	0	0	0	0	0	0
13:45 - 14:00	0	0	0	0	0	2	0	2
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>
14:00 - 14:15	0	0	0	0	0	0	0	0
14:15 - 14:30	0	0	0	0	0	0	0	0
14:30 - 14:45	0	0	0	0	0	1	0	1
14:45 - 15:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
15:00 - 15:15	0	0	0	0	0	0	0	0
15:15 - 15:30	0	0	0	0	0	0	0	0
15:30 - 15:45	0	0	0	0	0	0	0	0
15:45 - 16:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
16:00 - 16:15	0	0	0	0	0	0	0	0
16:15 - 16:30	0	0	0	0	0	0	0	0
16:30 - 16:45	0	0	0	0	0	0	0	0
16:45 - 17:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
17:00 - 17:15	0	0	0	0	0	0	0	0
17:15 - 17:30	0	0	0	0	0	0	0	0
17:30 - 17:45	0	0	0	0	0	1	0	1
17:45 - 18:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
18:00 - 18:15	0	0	0	0	0	1	0	1
18:15 - 18:30	0	0	0	0	0	2	0	2
18:30 - 18:45	0	0	0	0	0	0	0	0
18:45 - 19:00	0	0	0	0	0	2	0	2
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>5</b>
19:00 - 19:15	0	0	0	0	0	0	0	0
19:15 - 19:30	0	0	0	0	0	0	0	0
19:30 - 19:45	0	0	0	0	0	0	0	0
19:45 - 20:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
20:00 - 20:15	0	0	0	0	0	0	0	0
20:15 - 20:30	0	0	0	0	0	0	0	0
20:30 - 20:45	0	0	0	0	0	0	0	0
20:45 - 21:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
21:00 - 21:15	0	0	0	0	0	0	0	0
21:15 - 21:30	0	0	0	0	0	0	0	0
21:30 - 21:45	0	0	0	0	0	0	0	0
21:45 - 22:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
22:00 - 22:15	0	0	0	0	0	0	0	0
22:15 - 22:30	0	0	0	0	0	0	0	0
22:30 - 22:45	0	0	0	0	0	0	0	0
22:45 - 23:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
23:00 - 23:15	0	0	0	0	0	0	0	0
23:15 - 23:30	0	0	0	0	0	0	0	0
23:30 - 23:45	0	0	0	0	0	0	0	0
23:45 - 00:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>24</b>	<b>0</b>	<b>26</b>



TIME	Ahead to Walton Road (E)				Right to Footpath			
	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL
00:00 - 00:15	0	0	0	0	0	0	0	0
00:15 - 00:30	0	0	0	0	0	0	0	0
00:30 - 00:45	0	0	0	0	0	0	0	0
00:45 - 01:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
01:00 - 01:15	0	0	0	0	0	0	0	0
01:15 - 01:30	0	0	0	0	0	0	0	0
01:30 - 01:45	0	0	0	0	0	0	0	0
01:45 - 02:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
02:00 - 02:15	0	0	0	0	0	0	0	0
02:15 - 02:30	0	0	0	0	0	0	0	0
02:30 - 02:45	0	0	0	0	0	0	0	0
02:45 - 03:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
03:00 - 03:15	0	0	0	0	0	0	0	0
03:15 - 03:30	0	0	0	0	0	0	0	0
03:30 - 03:45	0	0	0	0	0	0	0	0
03:45 - 04:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
04:00 - 04:15	0	0	0	0	0	0	0	0
04:15 - 04:30	0	0	0	0	0	0	0	0
04:30 - 04:45	0	0	0	0	0	0	0	0
04:45 - 05:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
05:00 - 05:15	0	1	0	1	0	0	0	0
05:15 - 05:30	0	0	0	0	0	0	0	0
05:30 - 05:45	0	0	0	0	0	0	0	0
05:45 - 06:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
06:00 - 06:15	0	0	0	0	0	0	0	0
06:15 - 06:30	0	0	0	0	0	0	0	0
06:30 - 06:45	0	0	0	0	0	0	0	0
06:45 - 07:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
07:00 - 07:15	0	0	0	0	0	0	0	0
07:15 - 07:30	0	0	0	0	0	0	0	0
07:30 - 07:45	0	0	0	0	0	0	0	0
07:45 - 08:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
08:00 - 08:15	0	0	0	0	0	0	0	0
08:15 - 08:30	0	0	0	0	0	0	0	0
08:30 - 08:45	0	0	0	0	0	0	0	0
08:45 - 09:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
09:00 - 09:15	0	0	0	0	0	0	0	0
09:15 - 09:30	0	1	0	1	0	0	0	0
09:30 - 09:45	0	0	0	0	0	0	0	0
09:45 - 10:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
10:00 - 10:15	0	0	0	0	0	0	0	0
10:15 - 10:30	0	0	0	0	0	0	0	0
10:30 - 10:45	0	1	0	1	0	0	0	0
10:45 - 11:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
11:00 - 11:15	0	0	0	0	0	0	0	0
11:15 - 11:30	0	0	0	0	0	0	0	0
11:30 - 11:45	2	0	0	2	0	0	0	0
11:45 - 12:00	0	1	0	1	0	0	0	0
<b>Hourly Total</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
12:00 - 12:15	0	2	0	2	0	0	0	0
12:15 - 12:30	0	0	0	0	0	0	0	0
12:30 - 12:45	0	2	0	2	0	0	0	0
12:45 - 13:00	0	1	0	1	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
13:00 - 13:15	0	0	0	0	0	0	0	0
13:15 - 13:30	0	0	0	0	0	0	0	0
13:30 - 13:45	0	2	0	2	0	0	0	0
13:45 - 14:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
14:00 - 14:15	0	0	0	0	0	0	0	0
14:15 - 14:30	0	0	0	0	0	0	0	0
14:30 - 14:45	0	0	0	0	0	0	0	0
14:45 - 15:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
15:00 - 15:15	0	3	0	3	0	0	0	0
15:15 - 15:30	0	0	0	0	0	0	0	0
15:30 - 15:45	0	1	0	1	0	0	0	0
15:45 - 16:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
16:00 - 16:15	0	2	0	2	0	0	0	0
16:15 - 16:30	0	0	0	0	0	0	0	0
16:30 - 16:45	0	0	0	0	0	0	0	0
16:45 - 17:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
17:00 - 17:15	0	0	0	0	0	0	0	0
17:15 - 17:30	1	1	0	2	0	0	0	0
17:30 - 17:45	0	0	0	0	0	0	0	0
17:45 - 18:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
18:00 - 18:15	0	0	0	0	0	0	0	0
18:15 - 18:30	0	1	0	1	0	0	0	0
18:30 - 18:45	0	0	0	0	0	0	0	0
18:45 - 19:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
19:00 - 19:15	0	0	0	0	0	0	0	0
19:15 - 19:30	0	0	0	0	0	0	0	0
19:30 - 19:45	0	1	0	1	0	0	0	0
19:45 - 20:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
20:00 - 20:15	0	0	0	0	0	0	0	0
20:15 - 20:30	0	0	0	0	0	0	0	0
20:30 - 20:45	0	0	0	0	0	0	0	0
20:45 - 21:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
21:00 - 21:15	0	0	0	0	0	0	0	0
21:15 - 21:30	0	0	0	0	0	0	0	0
21:30 - 21:45	0	0	0	0	0	0	0	0
21:45 - 22:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
22:00 - 22:15	0	0	0	0	0	0	0	0
22:15 - 22:30	0	0	0	0	0	0	0	0
22:30 - 22:45	0	0	0	0	0	0	0	0
22:45 - 23:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
23:00 - 23:15	0	0	0	0	0	0	0	0
23:15 - 23:30	0	0	0	0	0	0	0	0
23:30 - 23:45	0	0	0	0	0	0	0	0
23:45 - 00:00	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>3</b>	<b>20</b>	<b>0</b>	<b>23</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

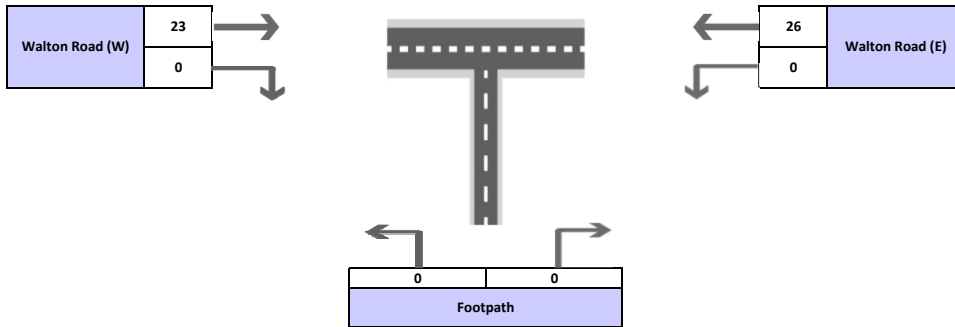
From: 1) 00:00

Show Peak Hour:

To: 1) 00:00

Class: All Vehicles

Wednesday 28th August 2024





Camera Removed at 20:16

TIME	Left to Coalpit Lane (E)			Ahead to Private Access			Right to Coalpit Lane (W)			TOTAL		
	PEDESTRIAN	CYCLE	EQUESTRIAN	PEDESTRIAN	CYCLE	EQUESTRIAN	PEDESTRIAN	CYCLE	EQUESTRIAN			
00:00 - 00:15	0	0	0	0	0	0	0	0	0	0		
00:15 - 00:30	0	0	0	0	0	0	0	0	0	0		
00:30 - 00:45	0	0	0	0	0	0	0	0	0	0		
00:45 - 01:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
01:00 - 01:15	0	0	0	0	0	0	0	0	0	0		
01:15 - 01:30	0	0	0	0	0	0	0	0	0	0		
01:30 - 01:45	0	0	0	0	0	0	0	0	0	0		
01:45 - 02:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
02:00 - 02:15	0	0	0	0	0	0	0	0	0	0		
02:15 - 02:30	0	0	0	0	0	0	0	0	0	0		
02:30 - 02:45	0	0	0	0	0	0	0	0	0	0		
02:45 - 03:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
03:00 - 03:15	0	0	0	0	0	0	0	0	0	0		
03:15 - 03:30	0	0	0	0	0	0	0	0	0	0		
03:30 - 03:45	0	0	0	0	0	0	0	0	0	0		
03:45 - 04:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
04:00 - 04:15	0	0	0	0	0	0	0	0	0	0		
04:15 - 04:30	0	0	0	0	0	0	0	0	0	0		
04:30 - 04:45	0	0	0	0	0	0	0	0	0	0		
04:45 - 05:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
05:00 - 05:15	0	0	0	0	0	0	0	0	0	0		
05:15 - 05:30	0	0	0	0	0	0	0	0	0	0		
05:30 - 05:45	0	0	0	0	0	0	0	0	0	0		
05:45 - 06:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
06:00 - 06:15	0	0	0	0	0	0	0	0	0	0		
06:15 - 06:30	0	0	0	0	0	0	0	1	0	1		
06:30 - 06:45	0	0	0	0	0	0	0	0	0	0		
06:45 - 07:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	1	0	1		
07:00 - 07:15	0	0	0	0	0	0	0	0	0	0		
07:15 - 07:30	0	0	0	0	0	0	0	0	0	0		
07:30 - 07:45	0	0	0	0	0	0	0	0	0	0		
07:45 - 08:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
08:00 - 08:15	0	0	0	0	0	0	0	0	0	0		
08:15 - 08:30	0	0	0	0	0	0	0	0	0	0		
08:30 - 08:45	0	0	0	0	0	0	0	0	0	0		
08:45 - 09:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
09:00 - 09:15	0	0	0	0	0	0	0	0	0	0		
09:15 - 09:30	0	0	0	0	0	0	0	1	0	1		
09:30 - 09:45	0	0	0	0	0	0	0	1	0	1		
09:45 - 10:00	0	0	0	0	1	0	0	1	0	2		
Hourly Total	0	0	0	0	1	0	0	2	0	2		
10:00 - 10:15	0	0	0	0	0	0	0	1	0	1		
10:15 - 10:30	0	0	0	0	0	0	0	1	0	1		
10:30 - 10:45	0	0	0	0	0	0	0	0	0	0		
10:45 - 11:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	2	0	2		
11:00 - 11:15	0	0	0	0	0	0	0	0	0	0		
11:15 - 11:30	0	0	0	0	0	0	0	0	0	0		
11:30 - 11:45	0	0	0	0	0	0	0	0	0	0		
11:45 - 12:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
12:00 - 12:15	1	0	0	1	0	0	0	0	0	1		
12:15 - 12:30	0	0	0	1	0	0	1	0	0	2		
12:30 - 12:45	0	0	0	0	0	0	0	0	0	0		
12:45 - 13:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	1	0	0	1	1	0	1	0	0	3		
13:00 - 13:15	0	0	0	0	0	0	0	0	0	0		
13:15 - 13:30	0	0	0	0	0	0	0	0	0	0		
13:30 - 13:45	0	0	0	0	0	0	0	0	0	0		
13:45 - 14:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
14:00 - 14:15	0	0	0	0	0	0	0	2	0	2		
14:15 - 14:30	0	0	0	0	0	0	0	0	0	0		
14:30 - 14:45	0	0	0	0	0	0	0	0	0	0		
14:45 - 15:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	2	0	2		
15:00 - 15:15	0	0	0	0	0	0	0	0	0	0		
15:15 - 15:30	0	0	0	0	0	0	0	0	0	0		
15:30 - 15:45	0	0	0	0	0	0	0	0	0	0		
15:45 - 16:00	0	0	0	0	0	0	0	1	0	1		
Hourly Total	0	0	0	0	0	0	0	1	0	1		
16:00 - 16:15	0	0	0	0	0	0	0	0	0	0		
16:15 - 16:30	0	0	0	0	0	0	0	0	0	0		
16:30 - 16:45	0	0	0	0	0	0	0	0	0	0		
16:45 - 17:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
17:00 - 17:15	1	0	0	1	0	0	1	1	0	3		
17:15 - 17:30	0	0	0	0	0	0	0	0	0	0		
17:30 - 17:45	0	0	0	0	0	0	0	0	0	0		
17:45 - 18:00	0	0	0	0	0	0	0	1	0	1		
Hourly Total	1	0	0	1	0	0	1	2	0	4		
18:00 - 18:15	0	0	0	0	0	0	0	1	0	1		
18:15 - 18:30	1	0	0	1	0	0	0	0	0	2		
18:30 - 18:45	0	0	0	0	3	0	0	0	0	3		
18:45 - 19:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	1	0	0	1	3	0	0	1	0	5		
19:00 - 19:15	0	0	0	0	0	0	0	0	0	0		
19:15 - 19:30	1	0	0	1	0	0	0	0	0	2		
19:30 - 19:45	0	0	0	0	0	0	0	1	0	1		
19:45 - 20:00	0	0	0	0	1	0	0	1	0	2		
Hourly Total	1	0	0	1	1	0	0	2	0	4		
20:00 - 20:15	0	0	0	0	0	0	0	0	0	0		
20:15 - 20:30	0	0	0	0	0	0	0	0	0	0		
20:30 - 20:45	0	0	0	0	0	0	0	0	0	0		
20:45 - 21:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
21:00 - 21:15	0	0	0	0	0	0	0	0	0	0		
21:15 - 21:30	0	0	0	0	0	0	0	0	0	0		
21:30 - 21:45	0	0	0	0	0	0	0	0	0	0		
21:45 - 22:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
22:00 - 22:15	0	0	0	0	0	0	0	0	0	0		
22:15 - 22:30	0	0	0	0	0	0	0	0	0	0		
22:30 - 22:45	0	0	0	0	0	0	0	0	0	0		
22:45 - 23:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
23:00 - 23:15	0	0	0	0	0	0	0	0	0	0		
23:15 - 23:30	0	0	0	0	0	0	0	0	0	0		
23:30 - 23:45	0	0	0	0	0	0	0	0	0	0		
23:45 - 00:00	0	0	0	0	0	0	0	0	0	0		
Hourly Total	0	0	0	0	0	0	0	0	0	0		
<b>TOTAL</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>12</b>





Camera Removed at 20:16

TIME	Left to Coalpit Lane (W)				Ahead to Footpath				Right to Coalpit Lane (E)			
	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL	PEDESTRIAN	CYCLE	EQUESTRIAN	TOTAL
00:00 - 00:15	0	0	0	0	0	0	0	0	0	0	0	0
00:15 - 00:30	0	0	0	0	0	0	0	0	0	0	0	0
00:30 - 00:45	0	0	0	0	0	0	0	0	0	0	0	0
00:45 - 01:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
01:00 - 01:15	0	0	0	0	0	0	0	0	0	0	0	0
01:15 - 01:30	0	0	0	0	0	0	0	0	0	0	0	0
01:30 - 01:45	0	0	0	0	0	0	0	0	0	0	0	0
01:45 - 02:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
02:00 - 02:15	0	0	0	0	0	0	0	0	0	0	0	0
02:15 - 02:30	0	0	0	0	0	0	0	0	0	0	0	0
02:30 - 02:45	0	0	0	0	0	0	0	0	0	0	0	0
02:45 - 03:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
03:00 - 03:15	0	0	0	0	0	0	0	0	0	0	0	0
03:15 - 03:30	0	0	0	0	0	0	0	0	0	0	0	0
03:30 - 03:45	0	0	0	0	0	0	0	0	0	0	0	0
03:45 - 04:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
04:00 - 04:15	0	0	0	0	0	0	0	0	0	0	0	0
04:15 - 04:30	0	0	0	0	0	0	0	0	0	0	0	0
04:30 - 04:45	0	0	0	0	0	0	0	0	0	0	0	0
04:45 - 05:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
05:00 - 05:15	0	0	0	0	0	0	0	0	0	0	0	0
05:15 - 05:30	0	0	0	0	0	0	0	0	0	0	0	0
05:30 - 05:45	0	0	0	0	0	0	0	0	0	0	0	0
05:45 - 06:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
06:00 - 06:15	0	0	0	0	0	0	0	0	0	0	0	0
06:15 - 06:30	0	0	0	0	0	0	0	0	0	0	0	0
06:30 - 06:45	0	0	0	0	0	0	0	0	0	0	0	0
06:45 - 07:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
07:00 - 07:15	0	0	0	0	0	0	0	0	0	0	0	0
07:15 - 07:30	0	0	0	0	0	0	0	0	0	0	0	0
07:30 - 07:45	0	0	0	0	0	0	0	0	0	0	0	0
07:45 - 08:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
08:00 - 08:15	0	0	0	0	0	0	0	0	0	0	0	0
08:15 - 08:30	0	0	0	0	0	0	0	0	0	0	0	0
08:30 - 08:45	0	0	0	0	0	0	0	0	0	0	0	0
08:45 - 09:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
09:00 - 09:15	0	0	0	0	0	0	0	0	0	0	0	0
09:15 - 09:30	0	0	0	0	0	0	0	0	0	0	0	0
09:30 - 09:45	0	0	0	0	0	0	0	0	0	0	0	0
09:45 - 10:00	0	0	0	0	1	0	0	1	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
10:00 - 10:15	0	0	0	0	0	0	0	0	0	0	0	0
10:15 - 10:30	0	0	0	0	0	0	0	0	0	0	0	0
10:30 - 10:45	0	0	0	0	0	0	0	0	0	0	0	0
10:45 - 11:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
11:00 - 11:15	0	0	0	0	0	0	0	0	0	0	0	0
11:15 - 11:30	0	0	0	0	0	0	0	0	0	0	0	0
11:30 - 11:45	0	0	0	0	0	0	0	0	0	0	0	0
11:45 - 12:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
12:00 - 12:15	0	0	0	0	1	0	0	1	0	0	0	0
12:15 - 12:30	0	0	0	0	0	0	0	0	0	0	0	0
12:30 - 12:45	0	0	0	0	0	0	0	0	0	0	0	0
12:45 - 13:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
13:00 - 13:15	0	0	0	0	0	0	0	0	0	0	0	0
13:15 - 13:30	0	0	0	0	0	0	0	0	0	0	0	0
13:30 - 13:45	0	0	0	0	0	0	0	0	0	0	0	0
13:45 - 14:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
14:00 - 14:15	0	0	0	0	0	0	0	0	0	0	0	0
14:15 - 14:30	0	0	0	0	0	0	0	0	0	0	0	0
14:30 - 14:45	0	0	0	0	0	0	0	0	0	0	0	0
14:45 - 15:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
15:00 - 15:15	0	0	0	0	0	0	0	0	0	0	0	0
15:15 - 15:30	0	0	0	0	0	0	0	0	0	0	0	0
15:30 - 15:45	0	0	0	0	0	0	0	0	0	0	0	0
15:45 - 16:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
16:00 - 16:15	0	0	0	0	0	0	0	0	0	0	0	0
16:15 - 16:30	0	0	0	0	0	0	0	0	0	0	0	0
16:30 - 16:45	0	0	0	0	0	0	0	0	0	0	0	0
16:45 - 17:00	0	0	0	0	1	0	0	1	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
17:00 - 17:15	0	0	0	0	0	0	0	0	0	0	0	0
17:15 - 17:30	0	0	0	0	0	0	0	0	0	0	0	0
17:30 - 17:45	0	0	0	0	0	0	0	0	0	0	0	0
17:45 - 18:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
18:00 - 18:15	0	0	0	0	0	0	0	0	0	0	0	0
18:15 - 18:30	0	0	0	0	0	0	0	0	0	0	0	0
18:30 - 18:45	0	0	0	0	0	0	0	0	0	0	0	0
18:45 - 19:00	2	0	0	2	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
19:00 - 19:15	0	0	0	0	0	0	0	0	0	0	0	0
19:15 - 19:30	0	0	0	0	0	0	0	0	1	0	0	1
19:30 - 19:45	0	0	0	0	1	0	0	1	0	0	0	0
19:45 - 20:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
20:00 - 20:15	0	0	0	0	1	0	0	1	0	0	0	0
20:15 - 20:30	0	0	0	0	0	0	0	0	0	0	0	0
20:30 - 20:45	0	0	0	0	0	0	0	0	0	0	0	0
20:45 - 21:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
21:00 - 21:15	0	0	0	0	0	0	0	0	0	0	0	0
21:15 - 21:30	0	0	0	0	0	0	0	0	0	0	0	0
21:30 - 21:45	0	0	0	0	0	0	0	0	0	0	0	0
21:45 - 22:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
22:00 - 22:15	0	0	0	0	0	0	0	0	0	0	0	0
22:15 - 22:30	0	0	0	0	0	0	0	0	0	0	0	0
22:30 - 22:45	0	0	0	0	0	0	0	0	0	0	0	0
22:45 - 23:00	0	0	0	0	0	0	0	0	0	0	0	0
<b>Hourly Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
23:00 - 23:15	0	0	0	0	0	0	0	0	0	0	0	0
23:15 - 23:30	0	0	0	0	0	0	0	0	0	0	0	0
23:30 - 23:45	0	0	0</									



From: 1) 00:00  Show Peak Hour:

To: 1) 00:00

Class: All Vehicles

