



SCOPING OPINION:

Proposed Tillbridge Solar Project

Case Reference: EN010142

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

04 November 2022



TABLE OF CONTENTS

1.	INTRODUCTION	1
2.	OVERARCHING COMMENTS	3
2.1	Description of the Proposed Development.....	3
2.2	EIA Methodology and Scope of Assessment	6
3.	ENVIRONMENTAL ASPECT COMMENTS	8
3.1	Air Quality	8
3.2	Climate Change.....	11
3.3	Cultural Heritage	14
3.4	Ecology.....	16
3.5	Flood Risk, Drainage and Surface Water.....	19
3.6	Human Health.....	22
3.7	Landscape and Visual Amenity.....	23
3.8	Noise and Vibration	27
3.9	Socio-economics and Land Use	30
3.10	Transport and Access	33
3.11	Other Environment Topics: Glint and Glare	38
3.12	Other Environmental Topics: Ground Conditions	40
3.13	Other Environmental Topics: Major Accidents and Disasters	41
3.14	Other Environmental Topics: Telecommunications, Television Reception and Utilities	43
3.15	Other Environmental Topics: Waste	44
 APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED		
 APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES		

1. INTRODUCTION

- 1.1.1 On 03 October 2022, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Tillbridge Solar Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Tillbridge Solar Scheme (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.
- 1.1.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

<http://infrastructure.planninginspectorate.gov.uk/document/EN010142-000010>
- 1.1.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.1.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.1.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including [Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

- 1.1.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

- 1.1.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Sections 2 and 3)

ID	Ref	Description	Inspectorate's comments
2.1.1	Figure 1-1	Site Location Plan	Figure 1-1 uses red dashed lines to show both the 'Preferred Cable Route Corridor Search Area' and the 'Alternative Cable Route Corridor Search Area'. As such, it is difficult to differentiate between the two areas. The Applicant should make efforts to minimise such optionality within the final application. Where the ES must include alternative options, a figure or figures should clearly distinguish options.
2.1.2	Paragraph 3.2	Construction compounds	<p>The Scoping Report states that one or more temporary construction compound(s) will be required. With the current wording it is not clear whether the construction compound(s) will be located within the Proposed Development's boundary (either Principal Site or the Cable Route Corridor¹) and/or whether additional land will be required for the construction phase.</p> <p>The ES should show the location of any construction compound(s) on a plan and describe the land-use requirement during construction, highlighting where additional land is required on a temporary basis.</p>
2.1.3	Paragraphs 3.45 to 3.49	Cable infrastructure	The Scoping Report sets out cable route options connecting the Principal Site to the Cottam sub-station. The Applicant should demonstrate that they have explored options to share cable infrastructure with similar solar developments within the local area.

¹ Paragraph 2.1 of the Scoping Report identifies two sections of the Proposed Development; The 'Principal Site' which will comprise of the "ground mounted solar photovoltaic (PV) panels, electrical sub-stations and energy storage facilities". The 'Cable Route Corridor', which will be the location of "the underground electrical infrastructure required to connect the Principal Site to national transmission system". Where relevant, this Scoping Opinion distinguishes between these two sections and the term 'Proposed Development' refers to the two sections combined.

ID	Ref	Description	Inspectorate's comments
			The ES should demonstrate the effects on the environment for each option and explain the main reasons for the option chosen.
2.1.4	Paragraphs 3.69 to 3.72	Design flexibility	<p>The Inspectorate notes the Applicant's intention to use the 'Rochdale Envelope' approach to maintain flexibility within the design of the Proposed Development. Paragraph 3.70 of the Scoping Report states that the amount of flexibility required will depend upon the progress of the design.</p> <p>The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES.</p>
2.1.5	Paragraphs 3.20 and 3.25	Battery Energy Storage System (BESS)	Paragraph 3.20 of the Scoping Report states that a BESS is included within the Proposed Development. However, paragraph 3.35 of the Scoping Report implies there are multiple BESSs. It is unclear whether the Proposed Development will include one or more BESS. The ES should include a description of all the components of the Proposed Development.
2.1.6	Paragraphs 3.66 and 3.67	Operational lifespan / decommissioning	The Scoping Report states that the anticipated design life of the Proposed Development is 40 years. After this time, it is expected that the Proposed Development would be decommissioned, however paragraph 3.66 suggests that decommissioning is not certain.

ID	Ref	Description	Inspectorate's comments
			<p>The ES should explain how the uncertainty around the design life of the Proposed Development has been accounted for in reaching the assessment conclusions. Any potential impacts arising from the Proposed Development should it operate beyond the 40-year timeframe should be assessed in the relevant ES aspect chapters.</p>

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 6)

ID	Ref	Description	Inspectorate's comments
2.2.1	N/A	Electromagnetic Fields (EMF)	<p>The Scoping Report provides no consideration of EMF. In line with relevant guidance (DECC Power Lines: Demonstrating compliance with EMF public exposure guidelines, A Voluntary Code of Practice 2012), cables above 132 kilovolts (kV) have potential to cause EMF effects. The Proposed Development would require the installation of infrastructure exceeding 132kV, including 400kV cables and two 400kV substations (as stated in paragraph 3.46 of the Scoping Report). Furthermore, there is potential for exceedances of 132kV where infrastructure overlaps. The Inspectorate considers that the ES should demonstrate the design measures taken to avoid the potential for EMF effects from the cable and substation infrastructure on receptors and address the risks to human health arising from EMF to the extent that it is relevant to the nature of the development and where significant effects are likely to occur.</p>
2.2.2	Appendix A	Transboundary	<p>The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard</p>

ID	Ref	Description	Inspectorate's comments
			<p>to any new or materially different information coming to light which may alter that decision.</p> <p>Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at:</p> <p>http://infrastructure.planninginspectorate.gov.uk/legislation-andadvice/advice-notes/</p>

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Air Quality

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Paragraphs 7.28 and 7.29	Plant related emissions arising during the construction phase	<p>The Applicant proposes to scope out an assessment of plant related emissions on the basis that the scale of construction required and number of plant vehicles means that the anticipated emissions would represent a small source relative to ambient local conditions. However, a qualitative construction phase dust assessment and a CEMP taking account of Institute of Air Quality Management (IAQM) guidance are proposed.</p> <p>Paragraph 3.58 of the Scoping Report states that at this stage of the application process, the anticipated peak construction period will give rise to 64 to 66 Heavy Goods Vehicle (HGV) deliveries per day as a worst case based on a 24-month construction period.</p> <p>On the basis that the predicted HGV movements of the project alone do not exceed the 200 HGV per day thresholds set out in guidance, the Inspectorate is content to scope this matter out from further quantitative assessment. The ES must provide up to date information on the anticipated construction programme and the predicted number of HGV movements to confirm that the thresholds are not exceeded.</p> <p>In light of other proposed developments within the area, the ES must also demonstrate that the thresholds for further assessment are not exceeded cumulatively on relevant links.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.2	Paragraphs 7.30 and 7.31	Operational phase	<p>The Applicant proposes to scope out air quality impacts associated with the operational phase on the basis that traffic movements would be minimal, limited to maintenance activities and infrequent heavier traffic movements associated with repairs or replacements of infrastructure.</p> <p>Minimal traffic movements are anticipated during operation. Paragraph 3.64 of the Scoping Report states that there would be a maximum of 10 to 12 staff on-site daily for monitoring, maintenance, and servicing activities during the operational phase and an average of 10 to 20 visits per year with four-wheel drive vehicles, HGVs, or transit vans for maintenance.</p> <p>Based on the characteristics of the operational phase of the Proposed Development the Inspectorate is content that minimal traffic movements would occur during operation. The ES must however provide information on the cumulative nature of traffic movements during the operational phases and confirm these projections fall below the relevant thresholds set out in guidance. On this basis, the Inspectorate is content to scope this matter out.</p>

ID	Ref	Description	Inspectorate's comments
3.1.3	N/A	Plan	The ES should be accompanied by a plan showing the location of sensitive air quality receptors within the vicinity of the Proposed Development to aid understanding of the extent of effects.
3.1.4	Paragraphs 7.25 and 7.26	Baseline conditions	The Scoping Report makes reference to information about existing air quality levels that is available from local authority monitoring programmes, primarily for nitrogen dioxide (NO ₂). Paragraph 7.26 confirms that in the absence of monitoring near the scheme and in

ID	Ref	Description	Inspectorate's comments
			<p>accordance with the Local Air Quality Management (LAQM) Technical Guidance, nitrogen dioxide diffusion tubes are currently being undertaken in the vicinity of the Proposed Development for a period of three months in order to verify the model. Effort should be made to reach agreement with the local authorities as to the location and number of the diffusion tubes. Agreement must also be sought with these bodies as to whether any further monitoring is required to provide a baseline for other pollutants.</p>
3.1.5	Paragraph 10.34	Potential for air quality impacts on designated nature conservation sites	<p>The Inspectorate notes that there is potential for air quality impacts on designated nature conservation sites (as noted in paragraph 10.34 of the Scoping Report). Baseline information from the Air Pollution Information System (APIS) may also be of relevance to the assessment.</p>
3.1.6	Paragraph 7.36	Receptors	<p>Paragraph 7.36 of the Scoping Report states that ecological sites, apart from some areas of ancient woodland, are not considered sensitive receptors due to their distance from the Proposed Development. However, paragraph 10.34 of the Scoping Report lists degradation due to dust deposition as a potential impact on ecological sites. As such there is inconsistency across the different chapters of the Scoping Report and it is unclear whether air quality impacts on ecological receptors will be assessed.</p> <p>For the avoidance of doubt, the ES should assess the potential for likely significant effects relating to air quality on ecological receptors. The Applicant should seek agreement on the sensitive receptors from relevant consultation bodies.</p>

3.2 Climate Change

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Table 8-2	In-combination climate change assessment – temperature change	<p>The Scoping Report states that although impacts are expected as a result of projected temperature increases, when considered in combination with the Proposed Development these are not expected to have a significant impact on receptors. No evidence has been provided to support this conclusion.</p> <p>In the absence of additional information, including the location of sensitive receptors, the Inspectorate is not able to agree to scope this matter out at this stage. The ES should assess the potential for temperature changes to exacerbate likely significant effects relating to the Proposed Development, including deliverability of mitigation measures such as, for example, vegetation screening and implications for achieving Biodiversity Net Gain (BNG).</p>
3.2.2	Tables 8-2 and 8-3	In-combination and resilience climate change assessment – sea level rise	<p>Tables 8-2 and 8-3 in the Scoping Report state that the Proposed Development is not located in an area that is susceptible to sea level rise, however there is no evidence to confirm this. The adjacent River Trent is noted to be a tidal river subject to flood defences, for which the Environment Agency has issued modelling ('Tidal Trent Climate Change Scenarios, 2021'). Based on the current information, the Inspectorate does not agree to scope this matter out. The ES should include an assessment of in-combination impacts from sea level rise where significant effects are likely to occur and a description and assessment of any likely significant effects resulting from the vulnerability of the Proposed Development to sea level rise. The ES should utilise the most up to date modelling available.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.3	Tables 8-2 and 8-22	In-combination Climate Change Impact Assessment – precipitation change	The Scoping Report states that there are no significant impacts anticipated from a change in precipitation as a result of climate change in-combination with the scheme. No drainage or flood risk modelling is provided to support this assertion. Solar panels have potential to alter runoff rates and patterns. In the absence of more detailed information regarding drainage design and controls, the Inspectorate does not agree to scope this matter out.
3.2.4	Table 8-2	In-combination Climate Change Impact Assessment – wind	<p>The Applicant proposes to scope this matter out on the basis that the Proposed Development is not likely to significantly affect receptors in combination with projected changes in wind patterns.</p> <p>On the basis that the Proposed Development is designed to be resilient to changes in wind patterns, the Inspectorate is content that significant in-combination effects on receptors in relation to wind are unlikely to occur. On this basis and given that wind is scoped into the resilience review, the Inspectorate therefore agrees that this matter can be scoped out.</p>

ID	Ref	Description	Inspectorate's comments
3.2.1	Paragraph 8.4	Green House Gas (GHG) impact assessment	It is unclear how the GHG impact assessment will determine which other forms of electricity production activities " <i>may be avoided or displaced</i> " as a result of the Proposed Development. The GHG impact assessment within the ES should describe any assumptions made to determine other electricity production activities and explain what is meant by being " <i>avoided or displaced</i> " as result of the Proposed Development.

ID	Ref	Description	Inspectorate's comments
3.2.2	Paragraph 8.26	Climate Change Resilience Statement	<p>The Scoping Report states that <i>"a statement will be provided within the ES to describe how the Scheme will be adapted to improve its resilience to future climate conditions"</i>. This statement should include a description and assessment of any likely significant effects resulting from the vulnerability of the Proposed Development to climate change. Where relevant, it should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from flooding.</p>

3.3 Cultural Heritage

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.3.2	Paragraphs 9.2 to 9.3	Study area	<p>The Scoping Report states that, measuring from the scheme boundary, the study area is 3km and 1km for designated and non-designated assets respectively. No justification however is provided into how these areas were determined. The ES should contain a robust justification to support the study areas and sensitive receptors selected for the purposes of the ES assessment, on the basis of recognised professional guidance and the extent of the likely impacts. It should be clear how the approach taken ensures that any heritage assets or conservation areas with long views towards or out from the Proposed Development have been identified and considered.</p> <p>The Inspectorate also considers that the setting influence of assets may extend beyond their strict designation boundary and that the wider landscape context should be considered in the assessment (in conjunction with assessments in the Landscape and Visual Amenity aspect chapter). Effort should be made to agree the approach and sensitive receptors with relevant consultation bodies. The study areas and locations of the heritage assets should be depicted on supporting plan/s.</p> <p>The Applicant's attention is drawn to consultation responses from Historic England and Lincolnshire County Council (Appendix 2 of this Opinion) which recommend that movement through a landscape, as</p>

ID	Ref	Description	Inspectorate's comments
			well as from fixed viewpoints, should be considered in terms of impacts on heritage setting.
3.3.3	N/A	Decommissioning	The Scoping Report states that impacts may arise during construction and operation but does not discuss the potential impacts that may arise during the decommissioning of the Proposed Development. The Inspectorate considers that an assessment of potential affects arising from decommissioning should be included within the ES, particularly in relation to buried archaeological features e.g. the removal of piles may result in harm to these features.

3.4 Ecology

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Paragraph 10.36	Attraction of aquatic invertebrates to solar panels	<p>The Applicant proposes to scope out this matter on the basis that there are no designated sites with aquatic invertebrate species or assemblages as qualifying features within the study area.</p> <p>The Inspectorate is content to scope out consideration of this matter on this basis.</p>
3.4.2	Paragraph 10.36	Attraction of birds to solar panels	<p>The Applicant proposes to scope out this matter on the basis that there is limited evidence from operational solar schemes to suggest that solar panels attract birds and increase the risk of mortality. The Scoping Report also notes that the Proposed Development is not located within a migratory route or near areas which support large congregations of birds.</p> <p>Considering the information available the Inspectorate is content that significant effects are unlikely to occur and as such this matter can be scoped out. However, the ES should ensure that impacts of the Proposed Development on birds are assessed using a suitable approach, seeking agreement from relevant consultation bodies where possible.</p>

ID	Ref	Description	Inspectorate's comments
3.4.3	Paragraph 10.32	Surveys for Polecat, Hedgehog, and Brown Hare	Scoping Report paragraph 10.32 states that specific surveys of Brown Hare, West European Hedgehog, and Polecat will not be conducted however no justification is provided for this approach.

ID	Ref	Description	Inspectorate's comments
			<p>Records of Brown Hare and Hedgehogs were found within the study area, as stated in Scoping Report paragraph 10.25 and the Preliminary Ecological Appraisal (PEA) provided in Appendix B.</p> <p>It is unclear why specific surveys for these species are not proposed, particularly considering Brown Hare and Hedgehogs have been recorded. The ES should consider effects on these species and be supported by robust survey data, unless otherwise agreed with relevant consultation bodies.</p>
3.4.4	Paragraph 10.34	Directional drilling methods	<p>The potential for sediment mobilisation and emissions of pollutants from the riverbed through the use of directional drilling methods or the vibration impacts arising from this method to install cable connections are not identified in this paragraph of the Scoping Report. The ES should consider the effects of drilling in watercourses on invertebrates and fish species found in these drilling locations.</p>
3.4.5	Appendix B (Table 6-1)	Preliminary Ecological Appraisal (PEA)	<p>Table 6-1 of the PEA (Scoping Report Appendix B) provides a summary of the ecological constraints and recommended further requirements. Impacts on non-statutory designated sites are not listed within the table despite there being sites located within the proposed Cable Route Corridor area. The ES should ensure that impacts on non-statutory designated sites are assessed and where there is the potential for significant effects to occur this should be assessed within the ES.</p>
3.4.6	Appendix B (paragraphs 5.4.10 to 5.4.12)	Ground nesting birds	<p>Following desk-based surveys, the Scoping Report identifies that ground-nesting bird species are likely to be impacted by the Proposed Development due to direct loss of arable habitat.</p> <p>In addition to the assessment of impacts at the project scale, the Applicant should assess the potential for the Proposed Development</p>

ID	Ref	Description	Inspectorate's comments
			to result in regional level impacts on ground nesting birds from the loss of suitable habitat.
3.4.7	N/A	Confidential annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.
3.4.8	N/A	Veteran trees	Veteran trees are not referenced in the Ecology chapter of the Scoping Report. The ES should identify any veteran trees which may be affected by the Proposed Development and explain how such features have been avoided or where this is not possible assess any likely significant effects that may arise.

3.5 Flood Risk, Drainage and Surface Water

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Paragraph 11.62	Non-statutory designated sites not hydrologically linked to the Proposed Development	<p>The Applicant proposes to scope out an assessment of impacts on water-dependent non-statutory designated sites (namely Whites Wood Local Wildlife Site (LWS), Birch Wood LWS, and Wharton Wood LWS) on the basis that these are not hydrologically linked to the Proposed Development due to their location upstream or in different hydrological catchments.</p> <p>The Inspectorate agrees that on this basis significant effects are unlikely, and these matters can be scoped out.</p>
3.5.2	Paragraph 11.75	Highfield Lane Drinking Water Safeguarding Zone (Groundwater)	<p>The Scoping Report states that given the distance from the site (over 20km northwest) impacts on this Safeguarding Zone are not considered further.</p> <p>The Inspectorate is content that given the distance from the Proposed Development significant effects are unlikely and as such is content that this matter can be scoped out.</p>
3.5.3	Paragraph 11.119	Temporary works	<p>The Scoping Report states that "<i>temporary works will not be assessed unless they are of a potentially significant scale and have the potential to adversely affect flood risk or impact the quality or form of water bodies</i>".</p> <p>Whilst the Inspectorate is broadly content that the ES only needs to assess impacts where there is potential for these to result in likely significant effects, it is unclear what is considered "<i>temporary works</i>" and whether this means the comprehensive scoping out of the construction or decommissioning phases. On the basis of the information provided the Inspectorate is not in a position to scope</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			this matter out at this stage. The ES should provide a description of the temporary works envisaged as well as an assessment of likely significant effects associated with these works.

ID	Ref	Description	Inspectorate's comments
3.5.4	Paragraph 11.78 and Appendix C (paragraphs 5.4 and 5.5)	Potential risks to watercourses	<p>Paragraph 11.78 identifies the risks on the water environment that are likely to arise during the construction phase. It is noted that the potential of sediment mobilisation from the riverbed arising through the use of directional drilling is omitted from this list. The ES should assess the potential for sediment mobilisation from drilling to impact on water quality and the potential for significant effects to occur, including on ecological receptors (see Box 3.4.4 above).</p> <p>Paragraphs 5.4 and 5.5 of Appendix C: Water Framework Directive (WFD) Screening set out the assumed mitigation measures that will be contained within the CEMP. The CEMP should also include a method statement outlining how pollution will be prevented during the construction phase and a silt management plan.</p>
3.5.5	Paragraph 11.89	Water quality sampling	<p>The Scoping Report states that no water quality sampling is proposed beyond a site walkover survey on the basis that a qualitative risk-based approach will be undertaken. No further justification is provided for this approach. The ES should describe the existing quality of water affected by the Proposed Development.</p> <p>Given that there are waterbodies within the Proposed Development boundary, the Proposed Development is located within multiple WFD catchments, and construction and operational impacts may alter water quality (as highlighted in paragraphs 11.78 and 11.82), surface water quality surveys should be undertaken to inform the baseline</p>

ID	Ref	Description	Inspectorate's comments
			and reported in the ES, unless otherwise agreed with relevant consultation bodies.
3.5.6	Paragraph 11.99	Attenuation ponds	The Scoping Report states that surface water will be stored using on-site attenuation. Further details of proposed attenuation ponds should be provided within the ES, including their size, capacity, and location. The ES should include this information as part of a plan to aid understanding.
3.5.7	Paragraphs 11.105 and 11.113	Methodology	<p>It is proposed that the impact assessment reported within the ES will not consider the flood risk impacts on the Proposed Development itself but this will be considered within the Flood Risk Assessment (FRA) which will be provided as an appendix to the ES.</p> <p>The Inspectorate is of the opinion that the ES should report the likely significant effects relating to flood risk, including both flood risk impacts on the Proposed Development and the potential for the Proposed Development to impact flood risk elsewhere.</p>
3.5.8	N/A	Water resources	<p>The Proposed Development is located within an area of 'serious water stress' designated by the Environment Agency.</p> <p>The ES should provide details relating to the water supply and demand requirements during the construction and operational phases.</p>

3.6 Human Health

(Scoping Report Section 12)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.6.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.6.2	Paragraphs 12.26 to 12.31 and Table 12-2	Significance criteria	<p>The Scoping Report sets out that the health assessment will adopt the NHS' Healthy Urban Development Unit (HUDU) assessment tool and paragraph 12.29 notes that this guidance does not provide significance criteria.</p> <p>The ES should provide significance criteria for this assessment so the reader can understand the potential of any significant effects arising from the health assessment.</p>
3.6.3	N/A	Vulnerable populations	The Scoping Report omits the inclusion of vulnerable populations. The ES should consider this population within the health assessment.

3.7 Landscape and Visual Amenity

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Paragraph 13.7	Cable Route Corridor Zone of Theoretical Visibility (ZTV)	<p>The Scoping Report states that due to the absence of a defined Cable Route Corridor at this stage, as well as the limited nature of work envisaged, a preliminary ZTV for the Cable Route Corridor Search Area has not been produced. It further states that a ZTV may be produced if subsequent works such as woodland removal is required, but there is no commitment to produce a ZTV for this area.</p> <p>The Inspectorate considers that a ZTV should be produced for the entirety of the study area boundary to ensure the Landscape and Visual Impact Assessment (LVIA) is fully representative of the Proposed Development. In the absence of a preliminary ZTV for this area, and information on the infrastructure which would be present within the Cable Route Corridor once operational, the Inspectorate is not in a position to scope this matter out on the basis of "<i>limited nature of work envisaged</i>". Furthermore, considering the duration of the construction phase (anticipated programme of approximately 24 months, as stated in paragraph 3.51 of the Scoping Report) the Inspectorate considers that there is potential for visual effects to occur. As such the ES should include an LVIA for the Cable Route Corridor which should be supported by a ZTV.</p>

ID	Ref	Description	Inspectorate's comments
3.7.2	Figures 13-1 and 13-2	Study area	The Scoping Report states that the LVIA study area has been informed by a desk-based review, an initial site visit, and subsequently the preliminary ZTVs. The ZTVs shown in Figures 13-1 and 13-2 show a 3km buffer around the Principal Site although no

ID	Ref	Description	Inspectorate's comments
			<p>justification is provided for this study area. Figures 13-1 and 13-2 also show high visibility up to the study area boundary. The Scoping Report notes (in paragraph 13.6) that longer-range views are also likely. This suggests that there is potential for visibility of the Proposed Development beyond the 3km study area shown in the ZTV.</p> <p>The Inspectorate considers that the study area should be informed by the extent of likely effects, including from elevated viewpoints, rather than an arbitrary boundary. The ES should evidence how the study area has been derived to ensure it is representative and it should be agreed with relevant consultation bodies where possible.</p>
3.7.3	<p>Paragraphs 13.5 and 13.8</p> <p>Figures 13-1 and 13-2</p>	Zone of Theoretical Visibility (ZTV)	<p>The Scoping Report states (in paragraph 13.5) that the preliminary ZTVs are based on maximum height of panels of 3.5m. It is stated that other associated infrastructure is not included at this stage but an "<i>an overly worst case has been assumed</i>" including substations at 12m in height. However, the preliminary ZTVs shown in Figures 13-1 and 13-2 are based on panel heights of 3m above existing ground levels. As such there is inconsistency within the Scoping Report. The ZTVs are unrepresentative of the potential visibility of the Proposed Development.</p> <p>The final ZTV should ensure that a worst case scenario is assessed based on the maximum parameters of the Proposed Development, including any auxiliary infrastructure such as security camera poles, fences, or construction compounds (although the Inspectorate notes the Applicant's intention to assess a worst case scenario, as stated in paragraph 13.8 of the Scoping Report).</p>
3.7.4	Paragraph 13.41	Receptors – boat users	<p>The Scoping Report considers the potential for visual effects on transient receptors such as recreational users of Public Rights of Way (PRoW) and people travelling by car, bicycle, bus, or train, but there is no consideration of boat receptors.</p>

ID	Ref	Description	Inspectorate's comments
			Considering the proximity of the Proposed Development to navigable rivers, e.g. the River Trent, the ES should consider the potential for visual effects on receptors navigating along rivers.
3.7.5	Table 13-10	Significance of effects	<p>The Scoping Report outlines the approach to assigning significance of effects, namely the relationship between the sensitivity of the receptor and the magnitude of impact. Table 13-10 shows that effects can be classified as 'minor', 'moderate', 'substantial', or 'major'.</p> <p>Typically moderate and major effects are deemed to be significant, whereas the Scoping Report suggests that substantial and major effects are considered to be significant whilst moderate effects could also be considered significant "<i>with reasoned justification</i>". It is unclear what a 'substantial' effect is as this is not identified in Table 13.10. The ES should provide descriptions for each of the categories of significance in line with the Guidelines for Landscape and Visual Impact Assessment (GLVIA).</p>
3.7.6	Paragraph 13.108	Neutral effects	<p>The Scoping Report states that only visual receptors that would experience a potentially significant adverse or beneficial effect will be considered. Those experiencing significant neutral effects will "<i>not be recorded in detail</i>".</p> <p>It is unclear what "<i>recorded in detail</i>" means. However, for the avoidance of doubt, the Inspectorate is of the opinion that all significant effects should be reported within the ES, particularly as the nature of an effect e.g. beneficial, adverse, or neutral, is subject to judgement.</p>
3.7.7	Paragraph 13.109	Existing vegetation	The Scoping Report states that there is potential for changes in existing vegetation outside of the Proposed Development boundary to potentially affect visual effects but " <i>the management and retention of such vegetation is outside the control of this Scheme</i> ". The ES should assess the potential for variation in significant visual effects where

ID	Ref	Description	Inspectorate's comments
			possible, ensuring that a worst-case scenario is assessed. The in-combination climate change assessment should consider the potential for climate change predictions to exacerbate landscape and visual effects as a result of changes to vegetation (refer to Box ID 3.2.1).
3.7.8	N/A	Lighting	<p>The Scoping Report makes no reference to impacts from lighting associated with the construction, operation, and decommissioning of the Proposed Development. Limited information is presented regarding the proposed lighting strategy during construction / decommissioning although it is understood that once operational the Proposed Development would not be permanently lit, and security lighting would be motion-activated (as stated in paragraph 3.41 of the Scoping Report).</p> <p>The ES should include a description of the proposed lighting strategy and assess the potential for likely significant effects to occur on receptors in relation to lighting during construction, operation, and decommissioning phases. This should include consideration of effects relating to intermittent lighting sources such as motion-activated security lighting. The ES should also evidence any measures taken to minimise impacts on sensitive human and ecological receptors.</p>

3.8 Noise and Vibration

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Paragraph 14.36	Operational traffic noise	<p>The Applicant proposes to scope out an assessment of noise associated with operational traffic on the basis that once operational the Proposed Development would generate minimal traffic.</p> <p>Considering the characteristics of the Proposed Development, and the anticipated level of traffic generation, the Inspectorate is content that this matter can be scoped out. However the ES description of development should confirm the anticipated trip generation (including number and type of vehicles) during operation to justify this.</p>
3.8.2	Paragraph 14.37	Operational vibration	<p>The Applicant proposes to scope out an assessment of operational vibration effects on the basis that no major vibration sources are anticipated to be introduced as part of the Proposed Development.</p> <p>Considering the nature of the Proposed Development during operation the Inspectorate is content to scope this matter out. However, the ES should describe the potential sources of vibration arising from the operation of e.g. substation, battery storage infrastructure, and tracker panel mechanisms, as well as any measures to control emissions.</p>

ID	Ref	Description	Inspectorate's comments
3.8.3	Figure 14-1	Plans	Figure 14-1 shows the location of the "nearest noise-sensitive receptors" in relation to the Proposed Development. The ES should provide a plan showing the location of all sensitive receptors assessed

ID	Ref	Description	Inspectorate's comments
			to aid understanding of the potential for significant effects relating to noise.
3.8.4	Paragraph 14.2	Receptors	<p>The Scoping Report states that only noise and vibration effects on human receptors will be assessed within the Noise and Vibration chapter of the ES and effects on ecological and cultural heritage receptors will be assessed within the respective aspect chapters of the ES.</p> <p>There is no reference to noise effects within the Cultural Heritage section of the Scoping Report and so it is not clear whether this will be considered within the ES. The ES should ensure that noise and vibration effects on cultural heritage assets are included within the ES, including consideration of effects on setting.</p> <p>Similarly, whilst the Ecology chapter of the Scoping Report refers to the potential for noise and vibration effects on ecological features during construction, the potential for operational noise effects is not listed (noting that operational vibration can be scoped out, as agreed in Box ID 3.8.2 above).</p> <p>The ES should ensure that the potential for noise and vibration effects on all sensitive receptors (human, ecological, and cultural heritage) are assessed.</p>
3.8.5	Paragraph 14.34	Tracking panels	<p>The Scoping Report states that solar PV panels, mounting structures, and cabling do not produce noise during operation. However, Scoping Report paragraph 3.6 identifies that the type of panel to be used is not yet determined and tracking panels may be used. Should this type of panel be used, the ES should assess the potential for significant noise effects on receptors during operation.</p>
3.8.6	Paragraph 14.43	Methodology	<p>The Scoping Report states that although significant effects relating to construction noise level will be determined based on exceedances of a</p>

ID	Ref	Description	Inspectorate's comments
			<p>Threshold Value, professional judgement will also be used to refine the significance of effects. For example, it is stated that only noise levels above the Threshold Value for more than 10-days/ weekends/ nights in a 15 consecutive day period or 40 days/ weekends/ nights within a 6-month consecutive period would be considered significant.</p> <p>This appears to be based on British Standard Guidance (BS 5228: Code of practice for noise and vibration control on construction and open sites – Part 1: Noise). However, this guidance refers to the above criteria in the context of this being the level at which noise insulation or temporary rehousing should be offered by Developers.</p> <p>The Inspectorate is of the opinion that there is potential for significant effects to occur at lower noise levels which would not require insulation or rehousing. The ES should justify the approach to defining significant effects, drawing on established practice and guidance where possible.</p>

3.9 Socio-economics and Land Use

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Paragraph 15.50	Commercial agreements between the Applicant and landowners	<p>The Scoping Report states that the assessment of the potential impacts of any commercial agreements for land between the Applicant and landowners is outside the scope of the Socio-economic and Land Use assessment.</p> <p>The Inspectorate agrees that this can be scoped out of the ES. However, the ES should address the change in agricultural land use e.g. from arable to grazing or changes in grazing regimes that arise from such agreements.</p>

ID	Ref	Description	Inspectorate's comments
3.9.2	Paragraphs 2.5 to 2.14, 10.35 and 15.48	Agricultural baseline	<p>There are inconsistencies within the Scoping Report relating to the description of current agricultural land use within the Principal Site. Paragraphs 2.5 to 2.14 and Chapter 15: Socio-economics set out the existing conditions of the Principal Site and identify arable fields but do not mention grazing activity (paragraph 15.48). In contrast, Chapter 10: Ecology notes that the agricultural land use includes arable crops and cattle grazing (paragraph 10.35).</p> <p>The ES should ensure that the baseline is reported consistently throughout the project description and across all assessments. This should quantify the land uses across the study area.</p>
3.9.3	Paragraphs 15.2 to 15.6	Study areas	<p>The Scoping Report states that there are various study areas for the socio-economic and land use assessment owing to the different characteristics of the receptors. Paragraphs 15.3 to 15.6 identify</p>

ID	Ref	Description	Inspectorate's comments
			<p>these study areas however it is unclear how these defined study areas were selected.</p> <p>The ES should include a clear justification as to how the study areas were chosen. The study areas and receptors should be depicted on corresponding figures to aid understanding. It should be clear how the selected study areas relate to the extent of the likely impacts.</p>
3.9.4	Paragraphs 15.22 and 15.37	Methodology - Agricultural Land Classification (ALC) survey	<p>The Scoping Report states that an ALC survey will be carried out within the scheme boundary to inform the baseline assessment of best and most versatile (BMV) agricultural land, yet no methodology detail is provided. The Applicant should ensure that the survey has sufficient coverage across the Proposed Development (including the cable route) to accurately inform the assessment in line with relevant guidance and/or standards (e.g. Natural England Technical Information Note TIN049, 2012), or justify why an alternative surveying methodology approach is sufficient. The ES should also show regard to the quantity and quality of land that will be permanently and temporarily lost to the Proposed Development and the potential for cumulative impacts at a regional scale with other plans and projects that result in a reduction of available BMV land.</p> <p>Additionally, the ES should include details of the decommissioning phase including the after use of the Proposed Development, with details relating to proposed methods of returning land to agricultural use and comparison to the baseline ALC survey.</p>
3.9.5	Paragraph 15.39	Methodology - overall	<p>The Scoping Report states the Socio-economic and Land Use ES assessment will follow "<i>Standard EIA Guidance</i>". However, the Scoping Report does not set out the specific guidance material to be used to inform the assessment. The ES should clearly set out the guidance documents used to inform the Socio-economic and Land Use assessment. Socio-economic impacts resulting from the Proposed Development should be quantified where possible. Where professional</p>

ID	Ref	Description	Inspectorate's comments
			judgement has been applied this should be clearly stated and suitably justified in the ES with reference to supporting evidence.

3.10 Transport and Access

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Paragraph 16.52	Operational transport effects	<p>The Applicant proposes to scope out transport effects during the operational phase on the basis that anticipated traffic would be minimal. Anticipated traffic generated includes 10 to 12 permanent staff on-site daily and infrequent four-wheel drive vehicles, vans, and HGV movements associated with the repair and replacement of on-site infrastructure.</p> <p>The Inspectorate has considered the characteristics of the operational phase of the Proposed Development and based on the low levels of anticipated traffic generation is content that this matter can be scoped out. The ES description of development should clearly set out the operational vehicle types and numbers to justify this position.</p>
3.10.2	Paragraph 16.53	Decommissioning phase transport effects	<p>The Scoping Report states that a standalone assessment for the decommissioning phase will not be undertaken. Decommissioning is anticipated to be similar in duration and nature to the construction phase and the likely impacts are expected to be either the same as or less than the construction phase.</p> <p>The Inspectorate is content that any potential impacts during decommissioning are not likely to be greater than the construction phase. On this basis the Inspectorate is content that a standalone assessment for the decommissioning phase is not required. However, where significant effects are likely to occur during the decommissioning phase these should be clearly reported within the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.3	Paragraphs 3.55, 16.44 and 16.87 to 16.89,	Hazardous and dangerous loads	<p>The Applicant proposes to scope out impacts of hazardous and dangerous loads. The Scoping Report states that there are no nearby road features (such as significant vertical drops) which suggest that the transfer of materials poses a risk beyond that which would be expected on the general highway network. It is stated that the ES would include an estimation of the likely number and composition of loads required and any measures which will be implemented to safely transport components.</p> <p>The Inspectorate has considered the nature and characteristics of the Proposed Development and agrees that significant effects are not likely to occur. On the basis that the number and composition of any hazardous loads and any safety measures would be described within the ES, an assessment of impacts associated with the transport of hazardous loads can be scoped out of the ES.</p>
3.10.4	Paragraph 16.93	Travel Plan	<p>The Applicant proposes to scope out a standalone Travel Plan. The Scoping Report states that the Framework Construction Transport Management Plan (FCTMP) will include a chapter on the anticipated construction work travel patterns as well as measures to promote alternative modes of transport. Operational transport effects are proposed to be scoped out on the basis that low levels of trips are anticipated to be generated.</p> <p>The Inspectorate is content that a standalone Travel Plan is not required and that the travel patterns associated with the construction workforce can be appropriately described within the FCTMP.</p>

ID	Ref	Description	Inspectorate's comments
3.10.5	Paragraphs 3.55 and 16.44	Abnormal loads	<p>The Scoping Report states that abnormal loads are anticipated to be required during construction. Appropriate measures to ensure safe transportation of hazardous loads should be included within the outline CEMP and/or FCTMP.</p> <p>The Inspectorate recommends the consideration of water-borne or rail transportation over road transport in line with the Overarching National Policy Statement for Energy (EN-1). The Applicant's attention is drawn to the consultation response from the Canal and River Trust (Appendix 2 of this Opinion) in this regard.</p>
3.10.6	Paragraphs 16.2 and 16.92	Consultation with National Highways	<p>Paragraph 6.92 of the Scoping Report states that consultation with National Highways will not be required given the distances from the Strategic Road Network (SRN). However, paragraph 16.2 states that consultation with National Highways will occur. As such it is unclear whether National Highways will be consulted.</p> <p>For the avoidance of doubt, the Inspectorate is of the opinion that there is potential for the Proposed Development to impact on the SRN through increased traffic during the construction and decommissioning phases and as such National Highways should be consulted. The Inspectorate refers the Applicant to National Highways' response to the scoping consultation (Appendix 2 of this Opinion).</p>
3.10.7	Paragraph 16.58	Sources of Information – Personal Injury Collision (PIC) data	<p>The Scoping Report states that further assessment of parts of the highway network may be required when the cable route is confirmed. Figure 16.6 shows the PIC Study Area of the Principal Site however does not show the study area for the Cable Route Corridor.</p> <p>It is unclear when confirmation of the cable route will occur and how this relates to the timeline for the production of the ES. The ES should ensure that the assessment is supported by a robust baseline.</p>

ID	Ref	Description	Inspectorate's comments
			Where there is flexibility within the project design a worst-case scenario should be assessed.
3.10.8	Paragraphs 16.78 and 16.79	Magnitude of impact	<p>The Scoping Report states that an increase of fewer than 30 additional vehicle trips per hour during each of the development peak hours would be categorised as very low magnitude, regardless of the proportional increase in traffic flows. Based on professional judgement, the Scoping Report cites that an increase of less than one vehicle every two minutes is unlikely to result in a significant effect.</p> <p>The Inspectorate is of the opinion that the assessment should use a proportional increase in traffic flows based on the existing baseline traffic flows for the highway network. In the absence of the baseline data, it is currently unknown what level of change the increase of 30 additional vehicles represents. The Institute of Environmental Management and Assessment (IEMA) Guidelines for Environmental Assessment of Road Traffic (GEART) (1993) (as referenced in paragraph 16.79 of the Scoping Report) states that the magnitude of impacts should be determined as a predicted deviation from the baseline condition.</p> <p>Furthermore, the types of vehicles are not specified within the 30 additional vehicle increase identified in paragraph 16.78 and therefore it is unknown whether HGV movements are captured in these absolute levels. The GEART states that HGV movement estimates should be provided separately.</p>
3.10.9	Paragraph 16.50	Cumulative impacts	<p>The Scoping Report states that the transport assessment will consider the impact of other committed developments in the vicinity which may have a cumulative impact during the construction phase. The Scoping Report does not list the other developments to be considered within the cumulative assessment.</p> <p>For the avoidance of doubt the ES should assess the cumulative impact of construction traffic on the SRN associated with other nearby</p>

ID	Ref	Description	Inspectorate's comments
			solar developments as well as committed developments and highway improvements schemes.

3.11 Other Environment Topics: Glint and Glare

(Scoping Report Section 17)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.11.1	Paragraphs 17.6 and 17.7	Glint and glare	<p>The Applicant proposes to scope out a standalone ES chapter on glint and glare. The Scoping Report notes (in paragraph 17.7) that glint and glare calculations will be provided in a separate technical appendix and results will be incorporated into the Proposed Development design. It is proposed that where solar reflection could occur and it is determined that it is likely to be a significant nuisance or hazard, mitigation will be proposed.</p> <p>Given the above, the Inspectorate is content that glint and glare do not need to be assessed as a standalone ES chapter and agrees that both matters should be addressed in the ES LVIA chapter and supported by detailed calculations provided in a technical appendix to the ES. Additionally, the technical appendix to the ES must clearly explain the assessment methodology (with reference to appropriate modelling and predictive techniques, charts/ diagrams and visual representations such as GIS based viewshed analyses) to indicate the likely extent and distance of potential glint and glare. Where professional judgement has been applied, this should be identified.</p>
3.11.2	Paragraph 17.6	Construction / decommissioning	<p>Based on the nature of the activities, the distances to receptors and the use of a Framework CEMP and a Framework Decommissioning Environmental Management Plan (DEMP), the Applicant proposes to scope out an assessment of impacts from glint and glare during construction and decommissioning out of the ES.</p>

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			The Inspectorate has considered the characteristics of the Proposed Development and is content that this matter can be scoped out.

ID	Ref	Description	Inspectorate's comments
3.11.3	N/A	Worst case scenario	At this stage it is not confirmed whether the solar arrays will use fixed or tracking panels. Given that the two different designs may lead to different glint and glare effects, the glint and glare assessment in the ES LVIA chapter and calculations in the technical appendix should assess the worst-case assessment for both options.

3.12 Other Environmental Topics: Ground Conditions

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Paragraphs 17.8 to 17.15 and Appendix E	Ground Conditions – Cable Route Corridor	<p>On the basis of design, management and mitigation measures informed by a phase 1 Preliminary Risk Assessment (PRA), the Applicant proposes to scope out a specific chapter on ground conditions.</p> <p>Whilst the Inspectorate agrees that the ground conditions in the Principal Site are unlikely to give rise to significant effects, it is noted that the PRA does not take into account the Cable Route Corridor. This area comprises a large portion of the total project and will be subject to intrusive ground works. As such, there is insufficient evidence to rule out any significant effects arising from works in this area. The Inspectorate is therefore not in a position to scope out ground conditions in the Cable Route Corridor.</p>

ID	Ref	Description	Inspectorate's comments
3.12.2	N/A	N/A	N/A

3.13 Other Environmental Topics: Major Accidents and Disasters

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Paragraphs 17.22 to 17.24 and Table 17-2	Separate chapter	<p>Scoping Report Table 17-2 sets out a list of potential impacts from major accidents and disasters to/from the Proposed Development including:</p> <ul style="list-style-type: none"> • Flooding; • Fire; • Road accidents; • Rail accidents; • Aircraft disasters; • Utilities failure; • Mining extractive industry; and • Plant disease. <p>Paragraph 17.23 states that the relevant ES aspect chapters will identify the potential significant effect for receptors where further design mitigation is unable to remove the potential interaction between a major accident or disaster.</p> <p>The Inspectorate is content that any significant effects resulting from major accidents or disasters can be assessed within the project description and/or relevant aspect chapters of the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The ES should not be a 'paperchase' and should clearly signpost where these impacts are assessed in other relevant chapters and where any relevant mitigation measures are secured.

ID	Ref	Description	Inspectorate's comments
3.13.2	Paragraph 17.18	Guidance	The Scoping Report refers to a lack of established guidance for this aspect topic. The assessment should refer to the IEMA guidance document 'Major Accidents and Disasters in EIA', where relevant.

3.14 Other Environmental Topics: Telecommunications, Television Reception and Utilities

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Paragraphs 17.25 and 17.26	Whole aspect	<p>Scoping Report paragraph 17.25 states that the location and safeguarding areas relating to utilities, telecommunications and television assets will be identified and consultation will inform how the Proposed Development will embed mitigation to avoid any direct impacts on these assets.</p> <p>No indirect impacts are anticipated due to the nature of the Proposed Development.</p> <p>Subject to the inclusion of measures to avoid direct impacts on utilities, telecommunications and television assets in the ES, the Inspectorate is content to scope this matter out from further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.14.2	N/A	N/A	N/A

3.15 Other Environmental Topics: Waste

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Paragraphs 17.27 to 17.34	Waste	The Inspectorate agrees that a standalone chapter on waste is not required within the ES. However, the ES should still contain a description of the potential waste streams of construction and decommissioning, including estimated volumes, and an assessment of the likely significant effects. In addition, the ES should describe any measures implemented to minimise waste and state whether the waste hierarchy will be utilised. If off-site disposal is required, an assessment of likely significant effects including intra-cumulative effects should be included within the ES.

ID	Ref	Description	Inspectorate's comments
3.15.2	Paragraphs 17.27 to 17.34	Component waste	<p>Solar developments are typically considered to be 30 to 40 year developments with panel degradation cited as a limiting factor on project lifespan. On this basis, the Inspectorate considers that some panels may need to be replaced during the operational life of the project. The ES should include an assessment of the likely impact of component replacement (e.g. batteries and panels) and outline what measures, if any, are in place to ensure that these components are able to be diverted from the waste chain. The ES should assess the likely significant effects from waste at decommissioning to the extent possible at this time.</p> <p>The Scoping Report states that a DEMP will be agreed with the Local Planning Authority. The Inspectorate would expect to see this secured through the inclusion of an Outline Decommissioning Plan, or similar, submitted with the Application. The ES should clearly set out how</p>

ID	Ref	Description	Inspectorate's comments
			decommissioning is to be assessed and any components which may remain following decommissioning. The ES should also consider the requirement for cumulative impacts to be assessed at decommissioning due to a number of solar farms in the local area also likely to be decommissioned at a similar timescale.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES²

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Integrated Care Board	NHS Nottingham and Nottinghamshire Integrated Care Board
	NHS Lincolnshire Integrated Care Board
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Lincolnshire Fire and Rescue Service
	Nottinghamshire Fire and Rescue Service
The relevant police and crime commissioner	Lincolnshire Police and Crime Commissioner
	Nottinghamshire Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Hemswell Parish Council
	Heapham Parish Council
	Upton Parish Council
	Springthorpe Parish Council
	Cottam Parish Council
	Stow Parish Council
	Brampton Parish Council

² Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Corringham Parish Council
	Fillingham Parish Council
	Glentworth Parish Council
	Harpswell Parish Council
	Torksey Parish Council
	Marton and Gate Burton Parish Council
	Willingham by Stow Parish Council
	Kexby Parish Council
	Treswell Parish Council
	South Leverton Parish Council
	North Leverton with Hablesthorpe Parish Council
	Rampton and Woodbeck Parish Council
The Environment Agency	The Environment Agency
The Marine Management Organisation	Marine Management Organisation
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Lincolnshire County Council
	Nottinghamshire County Council
The relevant strategic highways company	National Highways – Midlands
The relevant internal drainage board	Upper Witham Internal Drainage Board
	Witham Third Internal Drainage Board
	Ancholme Internal Drainage Board
	Scunthorpe and Gainsborough Water Management Board
	Isle of Axholme and North Nottinghamshire Water Level Management Board

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Trent Valley Internal Drainage Board
Canal and River Trust	Canal and River Trust
Trinity House	Trinity House
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
The Forestry Commission	Forestry Commission East & East Midlands
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS³

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Nottingham and Nottinghamshire Integrated Care Board
	NHS Lincolnshire Integrated Care Board
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	East Midlands Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
The relevant Environment Agency	The Environment Agency

³ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant water and sewage undertaker	Anglian Water
	Severn Trent
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Leep Gas Networks Limited
	Last Mile Gas Ltd
Quadrant Pipelines Limited	
Squire Energy Limited	
National Grid Gas Plc	
The relevant electricity generator with CPO Powers	EDF – Cottam Power Station
	Uniper – Cottam Development Centre

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Northern Powergrid (Northeast) Limited
UK Power Networks Limited	
Western Power Distribution (East Midlands) plc	
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operator Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))⁴

LOCAL AUTHORITY⁵
Bassetlaw District Council
Bolsover District Council
Cambridgeshire County Council
City of Lincoln Council
Derbyshire County Council
Doncaster Metropolitan Borough Council
East Lindsey District Council
Leicestershire County Council
Lincolnshire County Council
Mansfield District Council
Newark and Sherwood District Council
Norfolk County Council
North East Lincolnshire Council
North Kesteven District Council
North Lincolnshire Council
North Northamptonshire Council
Nottingham City Council
Nottinghamshire County Council
Peterborough City Council
Rotherham Metropolitan Borough Council
Rutland County Council

⁴ Sections 43 and 42(B) of the PA2008

⁵ As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY⁵

West Lindsey District Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Bassetlaw District Council
Bolsover District Council
Canal & River Trust
City of Lincoln Council
Civil Aviation Authority (submitted as two responses)
EDF – Cottam Power Station
Environment Agency
Fillingham Parish Council
Glentworth Parish Council
Health and Safety Executive
Historic England
Lincolnshire County Council
Marine Management Organisation (MMO)
Marton and Gate Burton Parish Council
Ministry of Defence
National Grid Electricity Transmission Plc
National Highways
NATS En-Route Safeguarding
Natural England
Network Rail
Newark and Sherwood District Council

NHS Lincolnshire Integrated Care Board
North Kesteven District Council
North LeVERTon with HabbleshORpe Parish Council
North Northamptonshire Council
Northern Gas Networks Limited
Nottinghamshire County Council
Nottinghamshire Fire and Rescue Service
SpringthORpe Parish Council
Torksey Parish Council
Trinity House
Uniper - Cottam Development Centre
United Kingdom Health Security Agency
West Lindsey District Council
Willingham by Stow Parish Council
Witham Third Internal Drainage Board and Upper Witham Internal Drainage Board

From: [REDACTED]
To: [Tillbridge Solar Project](#)
Cc: info@tillbridgesolar.com; [REDACTED]
Subject: RE: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 31 October 2022 15:00:26
Attachments: [image006.png](#)
[image007.png](#)
[Anlian Water - Scoping response - 311022 ds.pdf](#)

Dear Katie and PINS Tillbridge Solar team

Please find attached Anglian Water's response to the project's Scoping Report and consultation.

Can we flag that this is another NSIP application which has failed to consider water resources and water recycling and the potential impacts including carbon emissions from the need to divert utility assets.

I have copied in Voirrey Costain at Jacobs as they will be acting for Anglian Water on this NSIP.

Darl Sweetland DMS, MRTPI

Spatial Planning Manager

Mobile: [REDACTED]

Web: www.anglianwater.co.uk

Pronounced: dahl-sweetlund (he/him)

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire, PE29 6XU



Katie Norris
EIA Advisor
The Planning Inspectorate

www.anglianwater.co.uk
Our ref ScpR.TSP.NSIP.22.ds

31 October 2022

Dear Katie

**Tillbridge Solar Project
EIA Scoping Report consultation**

Thank you for the opportunity to comment on the scoping report for the above project which is within West Lindsay district in East Lincolnshire and the cable route extends into Bassetlaw district in Nottinghamshire.

Anglian Water is the appointed water and sewerage undertaker for the majority of the main site and most of the cable route shown on Figure 1.1. The water supply provider for the north east quarter of the site is Severn Trent. Water recycling services and assets for the south west end of the corridor route are provided by Severn Trent Water. The following response is submitted on behalf of Anglian Water in its statutory capacity and relates to potable water and water assets along with wastewater and water recycling assets.

- The Scheme – Existing infrastructure

There are existing Anglian Water assets including water mains along the north and east side of the main site and running eastwards from Heapham into the site. Supply pipes also cross the cable route. Water recycling assets including rising mains also run through the east of main site and in roads and areas serving communities within the cable route. Maps of Anglian Water's assets are available to view at the following address:

<http://www.digdat.co.uk/>

Anglian Water notes the absence of any reference to Anglian Water in the Scoping Report. Severn Trent is referenced only once in regard to discharge licence locations. We conclude from this that:

- all locations which have Anglian Water supply pipes and assets will be excluded from the final development main site area, the cable route both for construction and operation stages

- all locations which have Anglian Water sewer/ water recycling pipes and assets will be excluded from the final development main site area, the cable route both for construction and operation stages
- no surface water will be managed via the Anglian Water public sewer network and that all surface water will be managed using sustainable drainage
- no water supply is required for the development's construction or operation within Anglian Water's service area
- no water recycling and sewerage service are required for the development's construction or operation within Anglian Water's service area

In the event that the promoter has omitted the above points from the Scoping Report, Anglian Water would want to ensure the location and nature of these assets serving local communities and assets are identified and protected. To reduce the need for diversions and the attendant carbon impacts of those works, ground investigation would enable the promoter to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure.

In view of the guidance in the National Policy Statements we would have anticipated that the scoping would have included and then considered the approach to water supply, water resources and water recycling assets. Anglian Water requests that these points are assessed early in the EIA to set out how the project will be supplied with water, its wastewater managed, how water assets serving residents and business will be protected and how design has been altered to reduce the need for new water infrastructure or the diversion of existing assets.

The Construction Environment Management Plan (3.59) and Water Management Plan (5.5) should include steps to remove the risk of damage to Anglian Water assets from plant and machinery including haul roads. Further advice on minimising and then relocating Anglian Water existing assets can be obtained from:

connections@anglianwater.co.uk

- Water Resources

The site is in the Central Lincolnshire Water Resource Zone (WRZ), which supplies water to Lincoln and communities as from Sleaford to the Humber. We note that whilst the scoping considers water environment impacts it does not look at water resources. As the site is within an area of 'serious water stress' designated by the Environment Agency and water may be used in the project construction and operation this indicates that water resources should be assessed in the EIA. There is no reference to assessment of the carbon costs of relocating water infrastructure if assets are impacted during construction or operation.

Anglian Water notes that the applicant has not sought to scope these matters out by providing sufficient information to reach a conclusion that the projects impact regarding water supply as well as water recycling and water quality, are not significant.

- Engagement

Anglian Water would welcome the instigation of discussions with Tillbridge Solar Ltd (Table 17-2) as the prospective applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in delays to the project. On the basis that fuller consideration of water supply and water recycling matters does identify resources, assets and services may be impacted by the project we would recommend discussion on the following issues:

1. Impact of development on Anglian Water's assets including groundwater and water abstraction and the need for mitigation
2. The design of the project to minimise interaction with Anglian Water assets and specifically to avoid the need for diversions which have carbon costs
3. Requirement for potable and raw water supplies
4. Requirement for water recycling connections
5. Confirmation of the project's cumulative impacts (if any) with Anglian Water projects
6. Draft Protective Provisions

Further advice on water and wastewater capacity and options can be obtained by contacting Anglian Water's Pre-Development Team at:

planningliaison@anglianwater.co.uk

Please do not hesitate to contact me should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes or dates.

Darl Sweetland DMS MRTPI
Spatial Planning Manager



Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —

Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your Ref: EN010142-000010
Our Ref: 22/01475/PREAPP
Officer: Daniel Galpin
Email: planning@bassetlaw.gov.uk

31st October 2022

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.

Application by Tillbridge Solar Limited (the Applicant) for an Order granting Development Consent for the Tillbridge Solar Scheme (the Proposed Development).

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.

I refer to the request for a Scoping Opinion that was requested on October 3rd 2022. Due to an internal error there was a delay in sending out consultation letters and therefore not all have been received. We will forward these in due course.

Therefore, this response will contain generic advice based on the location of the proposed cabling route within Bassetlaw. The vast majority of the development proposal is situated within West Lindsey and therefore our comments will only focus specifically on the aspects of the development in Bassetlaw. Any consultation responses which have been received in will be included in this response. However, any responses received after this consultation response is issued will be passed onto the Planning Inspectorate and applicant/agent for consideration.

The submitted report contains the following chapters and I comment on them accordingly for you to take into consideration:

The Scheme

The overall scheme is substantial in its nature and is expected to generate around 500 Megawatts (MW) of renewable energy for the grid covering some 1,400 hectares (ha) of land. All of the built development is situated within West Lindsey with exception of the cable routing which will connect to Cottam Power Station on the opposite side of the River Trent. Therefore, unless there is a prospect of transboundary effects, our comments purely relate to the potential impact of the cabling route within Bassetlaw. As such, there are no comments with respect to the design of the scheme with respect to aspects such as the design of the solar panels.

Alternatives Considered

It is welcomed that the ES will contain a description of the alternatives that have been considered during the creation of the development proposal in accordance with Schedule 4 (2) of the Regulations. This appears to be consistent with the approach taken by the other Nationally Significant Infrastructure Project (NSIP) proposals which are at a more advanced stage. Nevertheless, it has been previously stated that this approach is not the most beneficial as once the ES has been submitted, this represents the 'final' proposal. The time where amendments can be realistically made is prior to submission at the stage of the production of the EIA Scoping Report and up to the statutory consultation period. It is known from the consultation workshops that have been undertaken that there has been a detailed approach to the site selection, so it would have been beneficial to see this detail in the EIA Scoping Report.

Consultation

There are no detailed comments to make at this stage. The Local Planning Authority did have some reservations initially about the targeted approach to consultation in terms of non-statutory consultation events which only involved targeted members of the community. Whilst this does have clear benefits, a proposal of this scale should take opportunities to maximise public engagement at all stages. It is welcomed that the Scoping Report has included details of a much wider effort to involve the general public. The Local Planning Authority has worked closely with the applicants/agents on the other NSIP proposals prior to the statutory consultation period(s) and would welcome the opportunity to do so again.

Comments on the general approach

The Local Planning Authority only has limited comments to make on the general approach. Each section of this letter will outline our comments on specific issues. Provided that the precise location of the cable route is not yet known, it is very difficult to make detailed comments. Therefore, our response to each chapter will focus on the key environmental designations. Relevant consultee comments will be forwarded when they are received as stated previously. All the relevant Development Plan Documents (DPDs) including Neighbourhood Plans, Local Plans and emerging Draft Bassetlaw Local Plan have all been included in the Scoping Report. The emerging Draft Bassetlaw Local Plan is anticipated to enter Examination this year with the potential adoption in the summer of next year. Therefore, this will carry progressively more weight during the DCO process.

Proposed Topics

Climate Change

Although the development itself will inevitably produce some carbon emissions, especially during the construction and decommissioning phases, it is clear that these will be more than mitigated for by the provision of 500 MW of clean energy per annum. Nevertheless, any efforts to reduce carbon emissions from the project itself should be scoped into the ES.

Please note Policies ST50 and ST51 from the emerging Draft Bassetlaw Local Plan and Policy DM10 from the Bassetlaw Core Strategy.

Landscape and Visual Amenity

This is one of the most important and sensitive considerations for the District. It should be made clear that any response received from Nottinghamshire County Council will form the basis for our comments and as such should be taken into account as well.

With regards to the cabling, it is more difficult to assess at this stage as the final route of the cabling is not yet known. Policy DM4 of the Bassetlaw Core Strategy, Section 12 of the NPPF and Policy ST37 of the Bassetlaw Core Strategy are all relevant. Also relevant are Policies 5 and 10 of the Rampton and Woodbeck Neighbourhood Plan and Policy 2 of the Treswell and Cottam Neighbourhood Plan.

Ecology and Biodiversity

The need for 10% net gain is welcomed and this should be scoped into the assessment. The Environment Act 2021 promotes biodiversity net gain in new development, albeit from 2023. However, the NPPF recommends securing net gains now. Reflecting the principles of national planning policy and the emerging provisions of the Act we would strongly recommend that the proposal secures at least 10% net gain in biodiversity to ensure that the value of the development exceeds the pre-development on site habitat value by at least 10%.

It will be possible to make specific comments when a more exact route is known. Ongoing consultation with the Nottinghamshire Wildlife Trust will be important. Designations such as SSSIs, Local Wildlife Sites and other relevant designations should be avoided where possible.

The most relevant policies are Policy DM9 of the Bassetlaw Core Strategy, Section 15 of the NPPF, Policies ST39 and ST40 of the Draft Bassetlaw Local Plan, Policy 6 of the Rampton and Woodbeck Neighbourhood Plan and Policy 2 of the Treswell and Cottam NP.

Hydrology, Flood Risk and Drainage

No further comments to make at this stage, it is noted that much of the cable route is located within flood zones 2 and 3 which should be avoided where possible. We will forward comments from Nottinghamshire County Council's Lead Local Flood Authority in due course.

Ground Conditions and Contamination

No comments to make at this stage. We will forward the response from the Environmental Health Officer in due course.

Minerals

The Nottinghamshire County Council Minerals Local Plan (Policy SP7) and Section 17 of the NPPF collectively give great weight to the benefits of minerals and on the economy and attempt to prevent unnecessary sterilisation of safeguarded mineral reserves. The County Planning Authority are best placed to comment on this matter and therefore we have limited comments to make. Any relevant consultation responses that we do receive will be passed on.

Archaeology

The final cable routing should ensure best efforts have been taken to avoid areas of archaeological interest. Where this is not possible, we would expect appropriate geophysical surveys, trial trench evaluations and appropriate mitigation to all be undertaken. We will forward any comments received from Lincolnshire County Council's Archaeologist in due course.

Heritage

Cottam to the north, Church Laneham to the south and Rampton to the west all have various designated and non-designated heritage assets that have the potential to be impacted by the proposed development. Cottam Power Station itself is a non-designated heritage asset and therefore should also be considered, although it is noted that permission has been granted for its demolition (21/01661/DEM) any weight given to this heritage assets will undeniably be reduced. Once the cable routing has been selected, it will be possible to offer more significant comments. It would be expected that once the cable routing is in place, it is unlikely that there will be any impact on relevant heritage assets, but this should be fully explored within the ES.

Any comments we receive from our Conservation Officer will be forwarded.

The most relevant policies are Policy DM8 of the Bassetlaw Core Strategy, Section 16 of the NPPF, Policy ST42 of the Draft Bassetlaw Local Plan, Policy 6 of the Rampton and Woodbeck Neighbourhood Plan and Policy 2 of the Treswell and Cottam NP.

Transport and Access

Please see below the response from Nottinghamshire County Council's Highways Officer:

'The Highway Authority would expect the DCO application to be supported by a Transport Assessment (TA) prepared in accordance with Planning Practice Guidance. A chapter should be included within the TA specifically dealing with the cable routing corridor in Nottinghamshire and which should also be addressed in the proposed Construction Environmental Management Plan. The opportunity to share cabling infrastructure with the other DCO solar schemes in the area should be explored.'

It is difficult to comment in more detail until the specific details of the cable routing are known.

Noise and Vibration

The section of the cable route appears to be situated away from sensitive receptors such as nearby population centres at Cottam, Rampton and Church Laneham but these effects will need to be fully considered in the ES. We will forward any response received from our Environmental Health Officer.

Glint and Glare

No comments to make in this respect. This is a significant consideration in relation to the solar panels themselves but not in relation to the cable routing.

Electromagnetic Fields

It is not anticipated that there would be any significant impacts arising as the result of a cable route. However, until an exact cable route is selected, it is not possible to make any further comments at this stage.

Light Pollution

No comments at this stage.

Major Accidents and Disasters

No further comments are required at this stage.

Air Quality

This would mainly be an issue during the construction period but until a more specific cabling route is agreed, there are no specific comments at this stage.

Socio-Economics, Tourism and Recreation and Human Health

No further comments are required at this stage.

Agricultural Circumstances

It is considered that this is an important issue for the District, especially when considering these proposals cumulatively with other similar proposals. It therefore should be fully considered in the ES. Paragraph 174 gives weight to the protection of Best and Most Versatile (BMV) land which comprises Grades 1, 2 and 3a agricultural land. This should be avoided when selecting a cabling route, but it is difficult to make specific comments at this stage.

Waste

Nottinghamshire County Council in their role as the Waste Planning Authority are best placed to make specific comments in this matter. Any relevant comments we received will be passed on in due course.

Telecommunication, Utilities and TV Receptors

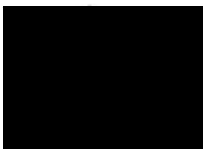
There are no further comments at this stage.

Conclusion

This forms a response from Bassetlaw District Council on the initial EIA Scoping Report. As stated at the start of this letter, we will forward any consultation responses we receive in due course.

This letter was undertaken at officer level and is subject to change if further information and does not prejudice future comments.

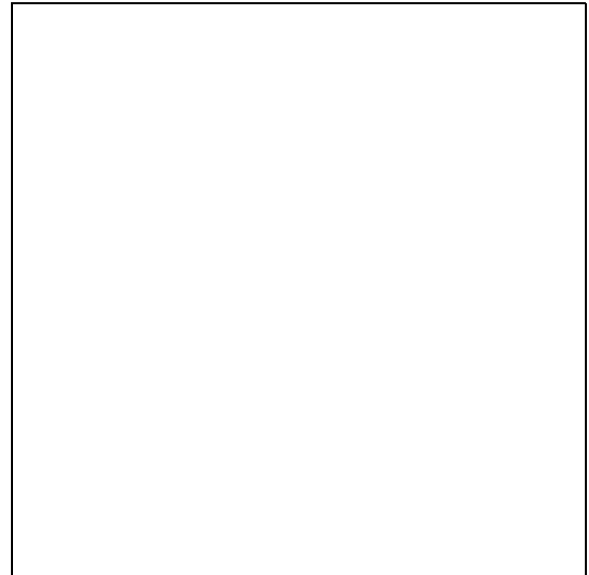
Yours faithfully



Development Team Manager

Enc

Response from Nottinghamshire County Council Highways



TOWN AND COUNTRY PLANNING ACT
HIGHWAY REPORT ON PROPOSALS FOR DEVELOPMENT (PRE-PLANNING APPLICATION
ADVICE)

DISTRICT:	Bassetlaw	Date received	27/10/2022
OFFICER:	Daniel Galpin	by D.C.	
PROPOSAL:	Proposed National Strategic Infrastructure Project Consultation	D.C. No.	22/01475/PREAPP
LOCATION:	East and south-east of Gainsborough, Lincolnshire.		
APPLICANT:	Tillbridge Solar Ltd		

The Highway Authority would expect the DCO application to be supported by a Transport Assessment (TA) prepared in accordance with Planning Practice Guidance. A chapter should be included within the TA specifically dealing with the cable routing corridor in Nottinghamshire and which should also be addressed in the proposed Construction Environmental Management Plan. The opportunity to share cabling infrastructure with the other DCO solar schemes in the area should be explored.

Martin Green
Principal Officer
28th October 2022

From: [REDACTED] on behalf of [Dev Control Enquiries](#)
To: [Tillbridge Solar Project](#)
Cc: [Dev Control Enquiries](#)
Subject: RE: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation (Our ref: 22/00518/NCO)
Date: 05 October 2022 11:32:11
Attachments: [image003.png](#)
[image004.png](#)

Hello

Further to the Scoping consultation received on the 3rd October 2022 regarding this project, I am writing to confirm that Bolsover District Council has no comments to make.

Kind regards,

Peter Sawdon
Principal Planner
Planning Department
Bolsover District Council
The Arc
High Street
Clowne
Derbyshire
S43 4JY

Tel: [REDACTED]
Website: www.bolsover.gov.uk

The contents of this e-mail represent my personal, professional, views, and do not necessarily represent the views of the Local Planning Authority, unless this is specifically stated in the e-mail.



Secretary of State
The Planning Inspectorate
Environmental Services
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref: EN010142-000010

Our Ref IPP-166

Friday 28th October 2022

BY EMAIL ONLY tillbridgesolarproject@planninginspectorate.gov.uk

EN010142-000010 Tillbridge Solar Farm ("the Project") – EIA Scoping Report Notification and Consultation
Waterway: River Trent

Thank you for your letter dated 3rd October 2022 on the Environmental Impact Scoping for the above project.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

Having reviewed the location of the Project and the Scoping Report (September 2022), we wish to make the following comments.

The Trust is Navigation Authority for the River Trent and has freehold landowner interests with respect to the riverbed. The River Trent falls within the Project's Area of Search in relation to the potential route for the cable corridor connection to Cottam National Grid sub-station. The Trust also own and manage the Fosdyke Canal, located to the south of the project area.

Cable Route Corridor

The Scoping Report identifies a cable route corridor which includes a stretch of the River Trent approximately 2km in length between Marton and Torksey.

We note that the Scoping Report states that the developers will be working on design development and environmental mitigation to reduce overall environmental and social effects, in particular on communities in proximity to the cable corridor and on known ecological and cultural heritage sensitive areas adjacent to the River Trent and we consider that this is an appropriate approach.

There are three other similar projects being progressed in the locality that include a similar stretch of the River Trent. This project overlaps with the corridor options for the Solar Farm projects at West Burton, Cottam and Gate Burton. The developers of the three other schemes have worked collaboratively on design development and

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

environmental avoidance mitigation to maximise opportunities for reducing overall effects and we consider that you may wish the Tillbridge Solar Farm project to engage with this joint approach.

We strongly recommend that the Trust is included by the developer in future discussions over the location of the cable crossing so we can advise on any potential issues likely to affect navigational safety or our interests as an affected landowner. The Trust is a statutory undertaker and has specific duties to protect its waterways. We would therefore resist any proposed use of compulsory purchase powers which may affect our land or undertakings and reserve the right to make representations regarding section 127 of the Planning Act 2008 during the examination of the application if necessary. Accordingly, we advise that the acquisition of any Trust land or rights over Trust land should be secured by agreement and we strongly recommend early contact from the developer with the Trust's Utilities Team to commence discussions over the terms of such an agreement ahead of submission of the DCO application. Please contact Beth Woodhouse, Senior Utilities Surveyor, at [REDACTED] or on [REDACTED] for further advice.

Overhead crossings of waterways have increased visual impacts to consider and the potential to restrict navigational height, which as navigation authority we would resist. The Scoping Report indicates at paragraph 3.47 that the cable crossing of the river will be underground, and we consider that this will assist in minimising visual impacts on the river and potential impacts on the use of the River Trent as a navigational waterway.

As the proposal would appear to involve works affecting the Trust's waterways, we will also require the developer to comply with the Trust's Code of Practice for Works Affecting the Canal & River Trust (current version dated April 2022, as updated from time to time) and recommend early discussion by the developer with the Trust's Infrastructure Services Team over all works likely to affect Trust property. Please contact Enquiries.TPWNorth@canalrivertrust.org.uk or on [REDACTED] for further advice.

Noise and Vibration

Works to install a cable crossing beneath the River Trent have significant potential to generate noise and vibration impacts and these effects on the River Trent and its users (noise sensitive receptors) should be considered within the Environmental Statement. In particular, works in proximity to the river need to be carefully managed to minimise the risk of significant vibration or loading that could adversely affect the stability of the riverbank. In carrying out ground investigations it should be noted that while the Trent is a river, it has been significantly engineered, so ground conditions may be highly variable in the vicinity of the river. Detailed survey work will therefore be necessary to inform methodologies around the design of the cable crossing of the River Trent.

Ecology and Biodiversity

The Scoping Report mentions the consideration of sediments in paragraph 11.78, but has not discussed in detail the potential for sediment mobilisation from the riverbed through the use of directional drilling methods to install cable connections beneath waterways such as the River Trent. There will be a small risk of vibrations leading to sediment mobilisation, or the emission of pollutants, although such impacts are considered likely to be minor to moderately adverse in the short to medium term. We consider that directional drilling can cause sediment discharges and problems arising from mud toxicity due to vibrations below the river. As a result, we believe the impact should be **scoped in**, with consideration given to the provision of field studies into invertebrates and fish species found in the water to assess the sensitivity of these species to potential sediment movement.

Temporary construction lighting along the cable corridor route in the vicinity of the River Trent will have the potential to disturb wildlife. As a result, we believe the impact should be **scoped in**, with consideration given to the provision of mitigation measures to minimise impacts on ecology and biodiversity, as well as landscape and visual impact.

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Landscape and Visual Impact

The River Trent is designated as a commercial waterway carrying freight and the Trust are navigation authority. It is therefore important that visual impacts (including impacts from glint and glare) on our waterways do not result in any harm to navigational safety and this should be fully assessed through the Environmental Statement. We do not consider that potential impacts on waterway users from glint and glare can be discounted without providing evidence to support such a position. The Environmental Statement should therefore provide sufficient evidence to demonstrate that significant visual impacts will not occur and the potential for adverse impacts on navigational safety should be considered within the glint and glare assessment. In view of the potential risk to navigational safety should there be any adverse impacts, the Trust considers that this matter should be explicitly considered in order to ensure that it can be discounted.

The sites for the solar panels are within proximity of the River Trent. As such, the landscape and visual impact assessment should fully consider users of these routes from both land and water perspectives (ie considering impacts for both walkers on any towpath/river walk or designated trail and boaters) and where necessary appropriate mitigation measures should be applied.

The Environmental Statement should also consider the potential visual impact of construction operations along the cable route corridor, which extends to, and includes part of, the River Trent. In particular, the siting of construction compounds should be considered within the LVIA, and river users should be considered as potential receptors. It is important that visual impacts are assessed within the context of the river being a navigable waterway and designated as a commercial waterway carrying freight. It is important that visual impacts on the river do not result in any harm to navigational safety.

Heritage

The River Trent is a non-designated heritage asset and as a river navigation has potential for archaeological interest. Whilst the Scoping Report appears to have included a full list of affected designated heritage assets, impacts on non-designated heritage assets and the archaeology of the river environment should also be scoped into the Environmental Statement.

Use of the River Trent for Freight

The installation of new solar farm equipment could involve the importation of significant indivisible heavy loads. The River Trent is a commercial waterway, where the transport of equipment may be possible which could help to minimise the need to utilise the Highway Network. There may be potential to use the River Trent to bring in components for the project to the EDF Energy Berth at Cottam Power Station. We advise that the use of the River Trent should be included within the Transport and Access chapter of the Environmental Statement, so as to ensure that every possibility to reduce the impact on the highway network is considered.

Impact on the Use of Dredging Tips

The stretch of river identified as the cable connection corridor lies immediately south of two areas of land in the Trust's ownership, located on either side of the river at Trentport, Marton. This land has been used as "dredging tips" (sites used for the deposition of dredged river silt). The site on the west side of the river and to the east of Coates Lane is still in use for this purpose. Any use of this land for routing cables could reduce the ability of the Trust to carry out future dredging activities on the River Trent, which is particularly important to facilitate continued navigation of the river by commercial vessels. We therefore recommend that, in considering the final cable route, and access to this part of the development, this land is avoided.

The Environmental Statement should consider any potential impacts on existing dredging tips, including consideration of the potential for them to contain elevated levels of contamination.

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Hazel Smith MRTPI
Area Planner – Midlands



<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>



Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk



CITY OF
Lincoln
COUNCIL

The Planning Inspectorate

Directorate of Communities & Environment

Simon Walters MBA, ACG, MCMI

City Hall, Beaumont Fee

Lincoln, LN1 1DF

Telephone: (01522) 881188

Facsimile: (01522) 567934

Website: www.lincoln.gov.uk

Lana Meddings is dealing with this matter

Direct Dial: 01522 873445

E-mail: [REDACTED]

Our Ref: 2022/0789/LAC

Your Ref:

Date: 6th October 2022

Dear Sir/Madam,

Town and Country Planning Act 1990

Location: Tillbridge Solar

Proposal: Application by Tillbridge Solar Limited (the Applicant) for an Order granting Development Consent for the Tillbridge Solar Scheme (the Proposed Development). Scoping consultation and notification of the Applicants contact details and duty to make available information to the Applicant if requested

Thank you for your consultation on the above and I would confirm that the City of Lincoln Council has no objections to this proposal.

Yours faithfully

[REDACTED]

Mr K Manning

Assistant Director - Planning

From: [Airspace](#)
To: [Tillbridge Solar Project](#)
Subject: [External] EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 25 October 2022 14:23:57
Attachments: [image001.png](#)
[image002.png](#)

Ref:

EN010142-000010

Application by Tillbridge Solar Limited (the Applicant) for an Order granting Development Consent for the Tillbridge Solar Scheme (the Proposed Development)

Good afternoon,

Thank you for oversight of the proposed Solar scheme.

The Civil Aviation Authority (CAA) has no comments to make on the scheme itself but writes to ensure that potentially affected aviation stakeholders are consulted. This is essential because the safeguarding of aerodrome operations is the sole responsibility of the aerodrome operator/licence holder.

- [Sturgate Airfield](#) borders the principal site to the West.
- RAF Scampton is approximately 7KM from the principal site and the safeguarding department at the Defence Infrastructure Organisation should be consulted - DIO-safeguarding-statutory@mod.gov.uk

Guidance on the CAA's role in planning consultations relating to proposed developments in the UK can be found on our website - <https://www.caa.co.uk/commercial-industry/airspace/event-and-obstacle-notification/planning-consultations/>

Please note it is essential that we are informed immediately whenever a LPA is minded to grant permission for a proposed development to which an officially safeguarded civil aerodrome or NATS has objected. This applies to all NATS sites and to the officially safeguarded aerodromes in England, Wales and Scotland.

Kind regards,

Airspace Regulation
Safety & Airspace Regulation Group
Civil Aviation Authority

www.caa.co.uk

Follow us on Twitter: [@UK_CAA](https://twitter.com/UK_CAA)

From: [REDACTED]
To: [Tillbridge Solar Project](#)
Cc: [REDACTED]
Subject: RE: [External] EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 31 October 2022 14:58:14
Attachments: [image001.png](#)
[image003.png](#)

Dear Katie,

We understand our colleague responded the consultation request below and communicated that the CAA are not a statutory consultee and requested consultation be extended to all aviation stakeholders in the area.

Despite not being a statutory consultee, we do have an observation at this stage. In paragraph 13.94 of the EIA Scoping Report, the following is noted:

“The emerging NPS EN-3 acknowledges that whilst solar PV panels are designed to absorb irradiation, that the Secretary of State will assess the potential impact of glint and glare on nearby homes and motorists. Paragraph 2.52.5 goes on to state that there is no evidence that glint or glare impacts upon aviation navigation and as such, no weight will be given to claims of aviation interference in considering proposed development.”

We must emphasise that the most recent NPS for Renewable Energy Infrastructure (EN-3) is a draft and has sought consultation responses of whom many safeguarding experts have refuted the statement in paragraph 2.52.5 that solar farms do not interfere with aviation.

Given the proposed solar farm is just 600 metres from Sturgate Airfield we would recommend that impact assessments are undertaken in order to determine whether there would be any adverse impact on the airfield’s operation.

If there are any questions related to the proposed development’s impact to aviation, we would be happy to discuss.

Caroline

Caroline Moore
Airfield Advisory Team Consultant
Civil Aviation Authority - International Group

T. [REDACTED]
E. [REDACTED]
W. www.caa.co.uk/international



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Part of the [UK CAA International Group](#).

Planning Inspectorate
(by email only)

17 October 2022

FAO Katie Norris

Dear Katie

Application by Tillbridge Solar Limited (the Applicant) for an Order granting Development Consent for the Tillbridge Solar Scheme (the Proposed Development) (Ref. EN010142-000010)

We act on behalf of EDF Energy (Thermal Generation) Limited (EDF) the owners and operators of Cottam Power Station (please see Appendix 1). We write in respect of the Proposed Development which is in close proximity to Cottam Power Station, and through which the Tillbridge cable easement is proposed to run in order to connect to the National Grid substation which is located within the Cottam Power Station boundary. EDF's interest in this proposal is in their capacity as:

1. Owner of the Cottam Power Station site with responsibility for the safe decommissioning and demolition of the power station assets.
2. Owner and operator of significant amounts of critical infrastructure on site through which the cable is proposed to run.
3. Landlord / Grantee for third party critical infrastructure on site including a Make Up and Purge Line which supplies the Uniper owned Cottam Development Centre, the Uniper owned 400kV cable and gas pipeline; National Grid underground and overground cables; WPD cables and Potable Water supplies.

EDF does not object to the principle of the Proposed Development. However, we would like to make the following comments for consideration by the Inspectorate.

EDF AND THIRD-PARTY INFRASTRUCTURE

EDF is not opposed to the above application provided a suitable cable easement route can be determined which -

- a) Protects EDF and third-party infrastructure from a technical / engineering perspective and does not jeopardise current operations or site demolition; or neighbouring Uniper operations.
- b) Ensures that any construction and operational activity is undertaken in full compliance with the terms of prevailing 3rd party legal agreements including easements.
- c) Recognises that the site is designated for 'Regeneration' in the Draft Bassetlaw Local Plan and ensures that the cable route does not sterilize development land or detract from future development plans

EDF are willing to discuss the technical feasibility of a cable route with the applicant.

POTENTIAL PROPOSED DEVELOPMENT

The Cottam site has been designated in the Draft Bassetlaw Local Plan as a 'Regeneration' site. EDF are keen to facilitate redevelopment of the site in line with the councils' requirements in the new

Local Plan and it is therefore imperative that any route should not infringe on the developable area. The route must be agreed in advance with EDF on terms which ensure that the cable does not impact on the future development potential of the Cottam site.

CONCLUSION

EDF and Tillbridge are working together to try and identify a suitable route that -

1. Does not impact on important existing EDF or 3rd party infrastructure or jeopardise current or future operations on site or at the neighbouring Uniper site.
2. Does not sterilise any future development land owned by EDF, particularly that which is earmarked as 'Regeneration Land' in the new Local Plan.
3. Includes a guarantee undertaking that the applicant will comply with all the terms of any and all prevailing legal agreements including, but not limited to, easements and wayleaves with 3rd parties.

EDF is supportive of solar and does not object to the principle of the Proposed Development, subject to the cable route not prejudicing existing and future operations at Cottam (including the safe decommissioning and demolition of the former power station) or the neighbouring Uniper site. In addition it is important that the cable routes do not impinge on future development plans for the Cottam site. We, therefore, suggest that a pre-commencement condition be imposed on the planning permission, if granted, requiring the subsequent approval of the final cable routing and that EDF be a named consultee at the time that condition comes to be discharged.

Please do not hesitate to contact us if you wish to discuss any aspects of the above and feel free to pass on our contact details to the Applicant.

Yours faithfully

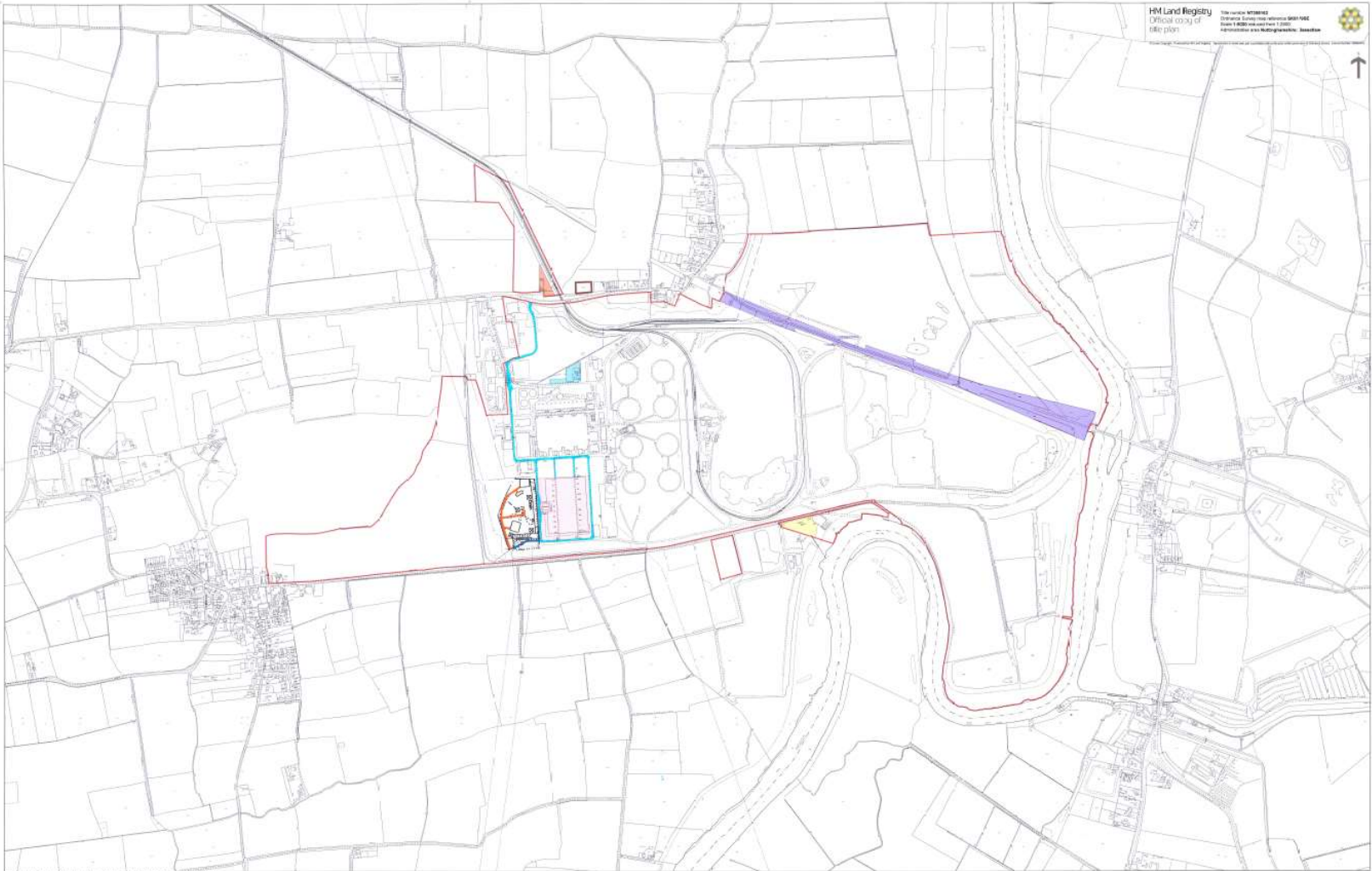


Cordelia Batt BSc MSc MRICS
RICS Registered Valuer
Associate

For and on behalf of Gerald Eve LLP
020 3486 3613



Appendix 1 – Site Plan of Cottam Power Station



Ms Katie Norris
The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: AN/2022/133583/01-L01
Your ref: EN010142-000010
Date: 21 October 2022

Dear Madam

Application by Tillbridge Solar Limited (the Applicant) for an Order granting Development Consent for the Tillbridge Solar Scheme (the Proposed Development)

Thank you for consulting us on the Scoping Report for the above project on 3 October 2022.

We have reviewed the Report and have the following comments to make on it, for issues that fall within the Environment Agency's remit. We set these out using the appropriate chapter headings in the Report.

Chapter 10 Ecology

Water Vole: we support the proposal for further survey work regarding water vole. Concerning river surveys, we would expect these to be carried out from within the channel. However, if this proves difficult, we support the use of water vole rafts as an alternative method for surveying; these should still follow timing and survey effort guidelines as per the relevant best practice.

In respect of the Biodiversity Net Gain (BNG) assessment, we suggest referring to relevant Biodiversity Opportunity Mapping documents that may provide enhancement and/or mitigation suggestions. The relevant contacts for this will be through the Nottinghamshire Biodiversity Action Group or the Greater Lincolnshire Nature Partnership, depending on the location.

The Applicant (if not already aware) may be able to utilise Environment Agency data within their assessment, which is accessible at:

[Open WIMS data](#); and
[England | Catchment Data Explorer](#)

Chapter 11 Flood Risk, Drainage and Surface Water

Flood risk: The 'Principal Site' where the solar arrays and equipment are proposed is generally located in flood zone 1 – land identified as having a low probability of flooding on the Environment Agency's flood map for planning. There is only a small amount of

land classified as flood zones 2 and 3 (medium/high probability). These areas of flood risk should be discussed in the flood risk assessment accompanying the Environmental Statement. We are currently gathering the flood risk data we hold, which the Applicant has requested.

For the site to remain operational during periods of flooding we recommend sensitive electrical and mechanical equipment is located in flood zone 1 and raised 300-600mm above ground level. Any development within flood zones 2 and 3 will need to consider the possible flood depths in order to remain operational during times of flooding, and ensure it does not increase flood risk elsewhere.

The cable route corridor is proposed to cross the River Till and the River Trent. Cable crossings for the main river watercourses will need a flood risk activity permit under the Environmental Permitting (England and Wales) Regulations 2016.

There may be a need for flood risk activity permits for temporary (construction) and permanent works. The flood defences must not be put at risk of damage or breach. If the Applicant wishes to use the provision under Section 150 of the Planning Act 2008 to remove a requirement for a prescribed consent or authorisation, relative to the Environment Agency's remit, they should commence discussions with us regarding this at the earliest possible opportunity.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- On or within 8 metres of a main river (16 metres if tidal)
- On or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- On or within 16 metres of a sea defence
- Involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- In a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

Further guidance is available at <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or by contacting our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or emailing enquiries@environment-agency.gov.uk.

Water Quality: Paragraph 11.52 appears to omit consideration of the Skellingthorpe Main Drain (GB105030062390), which should be included.

Water Resources: The assessment should also consider existing water abstraction licence holders and the impacts construction may have on any in the area. This should be taken into consideration before development.

As mentioned under the Ecology chapter above, the Applicant may also find additional data useful, which is available from the Environment Agency through:

[Open WIMS data](#)
[England | Catchment Data Explorer](#)

Potential Effects and Mitigation: Paragraph 11.78 refers to the potential risks to watercourses. In a future consultation, we would want to see a method statement outlining how pollution will be prevented during the construction stages, as well as a silt

management plan – it appears that the Construction Environmental Management Plan (CEMP), outlined in paragraph 3.59, should cover these issues. If there are any discharges to surface water planned during construction then the following guidance may be of use:

[Discharges to surface water and groundwater: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits)

We encourage the use of soakaways where possible to recharge groundwater as would be occurring naturally. Discharging runoff to watercourses has the potential to transport pollutants such as herbicides/ pesticides/ nitrates/ phosphates and silt and should be a last resort with mitigation in place to reduce the impact.

Only clean, uncontaminated water can be discharged to surface water so if the Applicant requires a permit, this should be applied for well in advance of any work starting. Pre-permitting advice is available and details can be found here:

[Get advice before you apply for an environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit)

Chapter 17 Other Environmental Topics

The assessment of the risks to controlled waters from contamination is to be undertaken in accordance with the risk management framework set out in 'Land contamination: risk management'. This is appropriate and we agree that a separate ground conditions chapter can be scoped out of the Environmental Statement. Further work is proposed in the form of a site investigation, which can be secured via Development Consent Order Requirements as appropriate.

Further pre-application consultation

Should the Applicant wish us to review any technical documents or want further advice to address the environmental issues, we can do this as part of our charged for service. Further engagement at the pre-application stage will speed up our formal response to their application and provide them with certainty as to what our response to the Development Consent Order application will be. It should also result in better quality and more environmentally sensitive development. As part of our charged for service, we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. The terms and conditions of our charged for service are available at

<https://www.gov.uk/government/publications/planning-and-marine-licence-advice-standard-terms-for-our-charges>

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me at the number below.

Yours faithfully

Annette Hewitson
Principal Planning Adviser

Direct dial [REDACTED]

Direct e-mail [REDACTED]



Chair, Fillingham Parish Meeting
Margaret O'Grady
9 Rectory Lea
Fillingham
Lincolnshire
DN21 5GE

Clerk, Fillingham Parish Meeting
Judith Russell
7 Rectory Lea
Fillingham
Lincolnshire
DN21 5GE

29th October 2022

Dear Ms Norris,

Many thanks for the opportunity to provide feedback on the Tillbridge Solar scoping report. The comments from Fillingham Parish Meeting are, as follows:

Consultation

As stated in the Environmental Impact Assessment (EIA) Scoping Report, consultation and community engagement are essential requirements in the development of a scheme of this nature. A list of events and activities are described, that have either been completed, or are planned, however, from experience of recent other developments at further stages of the NSIP process, the general levels of awareness and understanding remain at a very low base across the area, despite such activities.

With this in mind, and to demonstrate consultation in good faith, it is important that the EIA scoping includes a demonstration that the consultation has been effective in terms of engagement, reach and, where possible, response, to truly gauge the attitudes of key stakeholders and to ensure all possible aspects have been thoroughly addressed.

Alternatives Considered

As required by the EIA Regulations and Overarching National Policy Statement for Energy, consideration of alternatives is required by the applicant. From the EIA Scoping report, it is indicated that the EA would focus on alternative scheme layouts, sizing and design parameters. This would appear to be a very narrow consideration of alternatives.

Given the scale and potential impact of the proposal, the dimensions explored within the EA to consider alternatives should be significantly broadened, e.g. to what extent commercial and domestic rooftop solar development could contribute to the underlying objectives laid out in the Climate Change Act, which the proposed Tillbridge scheme aims to serve, or whether disaggregated solar development could be achieved without incurring the cumulative adverse impacts associated with displacing agricultural land (food production, employment, habitat destruction, visual amenity etc.)

Climate Change

The Climate section of the EIA Scoping Report appears to define the elements of climate assessment according to the very narrow perspective of the scheme's immediate impact on the environment.

Tillbridge Solar propose that the Environmental Assessment (ES) considers the Lifecycle (GHG) Assessment of the scheme, the In-Combination climate change impact (ICCI) assessment on the receiving environment and an assessment of Climate change resilience, but the EIA Scoping Report does not appear to indicate whether or to what extent the scheme may be assessed in terms of its ability to contribute to the targets set in the Climate Change Act 2008.

This would seem a fundamental omission, given the prominence of the decarbonisation and clean-energy messaging in the material provided by Tillbridge Solar, for instance, the vision:

Our vision for Tillbridge Solar is to deliver cleaner, greener, and lower cost energy, while also enhancing the local environment and ensuring we are a responsible developer.

Solar power will only provide its peak output during the summer and over a limited time period over the day. Typically, this is when UK electricity demand is at its lowest. Applying such large-scale solar schemes without overall consideration of the wider balancing of the National Grid will lead to waste and inefficiency. There are already periods in the summer where there is an excess of "inflexible" renewable and low-carbon energy, leading to producers being paid not to provide power. Allowing further schemes, such as Tillbridge, which do not consider the balancing and stability requirements of the National Grid will exacerbate this issue.

Tillbridge Solar should be encouraged to explicitly and transparently describe the role the scheme is expected to play in the transition to a low-carbon economy within the scope of the EA.

Wider Sustainability

Agricultural circumstances appear to be currently out of scope of the Environmental Statement. It is therefore not clear how or whether the environmental impact of displacing such a large area of agricultural land will be considered (particularly when considering Cottam, West Burton and Gate Burton proposed projects, of a similar scale, within the immediate area). At a simple level, with this, and other, such large-scale schemes, the question of where food and animal feed will be sourced from must be considered – and with it, the environmental implications of either increased food miles (e.g. through imported foods) or the potential for decreased national food resilience.

The EA should therefore include the wider impact of displacement of agriculture on sustainability of food production and the impact on food security, particularly given the potential for in-combination effects arising from other locally proposed schemes.

Human Health

Of particular concern to the community for a development at this scale are Access to open space & nature and Access to work and training – both of which are included within the EIA Scoping Report. It is hard to understand how the proposed development can do anything other than be a detriment to these aspects, and therefore also to the mental health and wellbeing of residents.

Socio-Economic

The National Planning Policy Framework (NPPF) emphasises the importance of building a strong, competitive economy by supporting “economic growth and productivity, taking into account both local business needs and wider opportunities for development” (paragraph 81) and helping to support a prosperous rural economy.

The local area is not affluent and has relatively few opportunities for employment. The EIA Scoping report acknowledged the lower levels of Gross Value Added (GVA) per head and economic activity as well as higher levels of unemployment than average in the UK.

The EA should go beyond describing the difficult socio-economic problems the region faces, and address how the proposed development aligns with or impacts local planning policies and actions that seek to address these issues.

Temporary

The EIA Scoping report refers to the “temporary nature of solar farms” (e.g. p90). Between construction, operation and decommissioning, a life cycle of c. 50 years does not reasonably constitute “temporary” in a human lifetime. Although potentially difficult and subjective, the EA should attempt to consider impacts and mitigations with regard to how these issues will impact people throughout their lifetime, rather than relying on a technical definition of “temporary” structures.

Overall, we understand the need for decarbonisation, and that solar has a role to play – but it should be ensured that the developer is not able to take advantage of a moment where a specific set of economic circumstances align, to develop at such a huge scale, in the name of a net questionable environmental benefit, particularly at the expense of the character and livelihoods of the local community and its surrounding landscape.

Yours sincerely.

A black rectangular redaction box covering the signature of Margaret O'Grady.

Margaret O'Grady, Chair, Fillingham Parish Meeting.

EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation

Feedback from Glentworth Parish Council

Thank you for the opportunity to provide feedback as regards the scoping report you are currently undertaking with regard to the Tillbridge Solar Project. Glentworth Parish Council has undertaken an initial survey of parishioners in order that this response can reflect their views.

Overall there is a feeling amongst parishioners that plans to date are lacking clarity and not given a high enough profile that one might expect for such an extensive project. We have been aware for some time of neighbouring (and no doubt related) projects – Gate Burton, West Burton and Cottam Solar Projects. The emergence of the Tillbridge Solar Project came in somewhat ‘under the radar’ with the proposers providing a lack of awareness and clarity on the project and a basic failure to communicate with the local community regarding the project – even the name ‘Tillbridge Solar’ is misleading as ‘Tillbridge’ refers to an area the other side of the neighbouring solar projects. Local residents largely consider this strategic and has brought a feeling of mistrust. Residents would first like there to be significant raising of awareness of this proposed solar farm and information that can be understood by the whole community.

Specific information that residents feel they need to know from the environmental statement and that they have significant concerns about are summarised below:

Climate Change and the need for renewable energy

Overwhelmingly, residents understand and support the need for renewable, less polluting energy. They do however require honest, understandable and broad picture information to be presented on the following points:

- The wider environmental impact of the project to include manufacture of components, transportation from source and materials such as concrete, roadways etc. involved in the building of the solar farm.
- A description of the infrastructure associated with solar panels has not been publicised, for example, the warehouse type buildings holding the batteries, the 10m high transformers that will be required, large scale fencing, lighting and security systems that will cause concern over noise, safety and impact to the area.
- The environmental impact of decommissioning the solar farm after its 40-year lifetime.
- Why solar has been chosen over other (more locally manufactured) products such as wind turbines that may have a smaller impact on the environment?
- Residents would like all information to be presented in a way that can be easily understood by all residents, backed up by independent accreditation of the data.

Agricultural and habitats

The area under consultation is mainly arable, food producing land. Much of the farmland is occupied by tenant farms, ie people who may lose their tenancy and livelihood without any financial gain from the project (as they are not the land owner). Many residents cited concerns over national food security and whether the change of land use from one ‘green’ purpose to another ‘green’ purpose would have much impact on overall carbon efficiency. Residents would like information presented on the following points:

- Honest, independent and up to date information about the quality of arable land for food production and the loss of yield over time that there will be as a result of this project.
- Farmers on this land have reported an increased yield this year which has been hot and dry. With this in mind, we would ask that the ES reports on the performance of this land should climate change cause more growing seasons of the type we have just had.
- A clear indication of jobs lost in agriculture vs jobs gained as well as proposals to support those whose livelihoods will be lost.
- An environmental impact report regarding wildlife across the project.
- A strategy for securing animal feed for the local area and support for remaining livestock to avoid culling of pigs, cattle and other animals that may result should feed currently sourced locally be unavailable as a result of the project.
- The scoping report shows four reservoirs within the site area. There are large numbers of migrating birds visit these reservoirs. The scoping document makes no reference to these reservoirs and the impact on water birds. Sciencenode.org report (2020) states that up to 138,000 birds are killed every year in the US by collision with solar panels. Residents would like to know how this problem would be mitigated.

Land use

Residents understand that our locality to existing power stations and the national grid is partly the reason for this proposal. Taking into account the points made above however, residents would like to know how use of land as proposed is efficient in the wider picture and whether other options - either different technologies (wind, nuclear etc.) or areas such as existing rooftops have been considered.

Financial and data honesty.

There is concern amongst residents, especially in the way that this project has emerged in what feels to have been by 'tick box' stealth strategy, there is further information which they would like to know. In particular:

- Which organisations or companies are the ultimate beneficial owners of this scheme?
- Does the project have a wider strategic gain for organisations further afield through subsidies, corporate (eg carbon offset targets) or political gain?
- How secure are the stated power generation figures to include loss of power due through lengthy cable corridors.
- An honest comparison of power generation between this solar site and other renewable options such as wind turbines.

Communication

Residents would like to know how the developers will communicate their plans as they evolve and move forward. In the village of Glentworth, it was our brief survey that alerted many residents to this proposal. Whilst there is a website, this has not been given a high profile and indeed it should be noted that our experience with the wide demographic of residents in the village is that a range of communication strategies are required (many people here do not use internet and social media).

Impact on natural beauty of the area

The Central Lincolnshire Local Plan, policy LP17 states that the Lincoln Edge is an 'area of great landscape value'. The scoping report shows photos of farmland taken from a number of aspects around the proposed site. Not one photo has been taken from Middle Street/the B1398 between Glentworth and Harpswell and the views west over the Till valley, despite the site going up to the road. It has been noted that certain areas of the solar farm have been set back from these roads. Residents would like to see images indicating what the views would look like once works are complete in order to make an informed opinion of the views including the proposed solar farm.



The above photographs are taken from the B1398. Simulations showing the same views once these fields have been covered with a solar farm should be provided to help residents provide an informed opinion to the consultation.

In conclusion and to help with your scoping report, in Glenworth Village understands the need for global decarbonisation and the role solar may have a part to play in it. It is strongly feared however that a solar farm of such huge scale (especially when considered alongside neighbouring proposed projects) is not of overall benefit to local or national economy and environmental gain.

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.
HSE email: NSIP.applications@hse.gov.uk

Email: tillbridgesolarproject@planninginspectorate.gov.uk

Dear Ms Norris

Date: 14 October 2022

**PROPOSED TILLBRIDGE SOLAR SCHEME (the project)
PROPOSAL BY TILLBRIDGE SOLAR LTD (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 3 October 2022 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records the proposed DCO application boundary for this Nationally Significant Infrastructure Project just falls into the inner middle and outer zones of a Major Accident Hazard Site (MAHS) and a Major Accident Hazard Pipeline (MAHP). There are other MAHS and MAHP within the 2Km buffer marked on the Site Location Map. This is based on the Site Location map contained in the Tillbridge Solar EIA Scoping Report, September 2022, Figure 1-1.

The major accident hazard site is :

- HSE reference 4154 EDF Energy Ltd, Cottam Power Station, Nottinghamshire

The Applicant should make contact with the above operator, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

The major accident hazard pipeline is:

- HSE reference 11166, Uniper and E.ON UK, Blyborough to Cottam PS Pipeline.

The Applicant should make the necessary approaches to the relevant pipeline operator. There are three particular reasons for this:

- i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.

iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present. Based on the information in the Tillbridge Solar EIA Scoping Report, September 2022, it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Hazardous Substance Consent

It is noted that the development plans to incorporate battery storage into the solar scheme. The Tillbridge Solar EIA Scoping Report, September 2022 does not provide details of the battery storage.

It is not clear whether the Applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. Hazard classification is relevant to the potential for accidents. For example, hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an addition rule in the Schedule for below-threshold substances. If hazardous substances planning consent is required, please consult HSE on the application.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - Annex G – The Health and Safety Executive . This document includes consideration of risk assessments on page 3.

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely



Allan Benson
CEMHD4 NSIP Consultation Team

From: [REDACTED]
To: [Tillbridge Solar Project](#)
Cc: [Midlands ePlanning](#)
Subject: RE: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation PL00791303 - HISTORIC ENGLAND ADVICE
Date: 31 October 2022 17:53:38
Attachments: [image003.png](#)
[image004.png](#)

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11
Application by Tillbridge Solar Limited (the Applicant) for an Order granting Development Consent for the Tillbridge Solar Scheme (the Proposed Development)

Your Ref. EN010142

Our Ref. PL00791303

HISTORIC ENGLAND ADVICE

Dear PINS

Thank you for consulting us on this EIA Scoping for Tillbridge Solar, one of a group of large scale solar projects currently in development as NSIPS in this area of the East Midlands - with associated grid connections.

We welcome the inclusion of heritage matters in the submitted scoping report and look forwards to ongoing discussions with the applicants in respect of both setting effects upon heritage assets and direct impacts upon archaeological remains.

We note the iterative approach to investigations set out in the report and will look forwards to early sight of the results of cartographic, geophysical survey, lidar and aerial photographic analysis and the results of the applicant's detailed consultation with County Archaeological Curators and Historic Environment Records and Portable Antiquities Scheme Records. Trial trenching will inevitably be necessary in advance of determination to ensure that the elasticity of the scheme in terms of extent, layout and detailing can be effectively deployed to address impacts upon the significance of buried remains (in particular though the identification and differentiation of those classes of feature most vulnerable to pile installation). We refer you to expertise of the County Archaeological advisors.

We welcome a palette of mounting techniques and the informed use of open grassland areas to allow for the management physical impacts upon buried remains. In addition to the focus upon the impact of the panel arrays, fencing substations etc we note that this and related schemes include significant cable infrastructure for connection to grid. The significance / character / importance of assets on these cable routes will need to be well understood from an early stage such that route options can effectively be weighed and risks managed. Opportunities to share cable routes with other schemes should be actively sought. It is important both that opportunities for reduction in harm are realised and that the time required for archaeological evaluation and reporting is allowed for. Areas of heightened risk (burial sites / wet deposits /

former water courses etc) should be afforded early attention as should resources requiring particular methodological approaches such for instance as battlefields or air crash.

Given the landscape scale of this and associated (nearby) projects the schemes should seek to address structures research questions about this landscape to ensure that localised archaeological interventions contribute to a whole (in terms of public value) which is more than the sum of their parts (see <https://researchframeworks.org/emherf/>).

We will discuss viewpoint locations further with the applicants and the potential for kinetic (sequential) views to add value to the assessment as the work progresses.

Without prejudice to the results of analysis (which will benefit from use of our *GPA Setting of Heritage Assets*) we take this opportunity to highlight the following sites and their setting (as identified in the scoping report).

- The Fleet Plantation moated site (NHLE 1008594)
- Harpswell Hall – (NHLE 1019068)
- A Moated manorial complex immediately northwest of Elm Tree Farm (NHLE 1016920), which lies approximately 800m to the west of the Principal Site;
- Post-medieval Dovecote at Elm Tree Farm (NHLE 1020196);
- The site of Torksey medieval town (NHLE 1004991) in Nottinghamshire
- The Roman fort south of Littleborough Lane (NHLE 1004935)
- The scheduled Roman town of Segelocum (NHLE 1003669)
- The post-medieval remains of the ruins of a 16th century (post-medieval) Elizabethan mansion (NHLE 1005056),

It is of particular importance to note to that the scheduled areas at Torksey, Littleborough etc only reflect those areas of national important remains identified in those particular designation episodes – remains are now known to extend more widely and there is high potential for further remains of national importance to survive in this extremely sensitive section of the Trent.

As set out in our ***GPA 3 Setting of Heritage Assets*** at structured approach to setting impacts should be undertaken, it is generally unwise to apply a rigid radius for the assessment of setting effects, targeting for assessment should consider topography, designed and borrowed landscape relationships and the role of movement through the landscape as well as fixed point views and vista.

We look forwards to further detailed discussion with the applicants.

Yours sincerely

Tim Allen

Tim Allen MA FSA
Development Advice Team Leader (North)

Midlands Region
Historic England

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From: [REDACTED]
To: [Tillbridge Solar Project](#)
Subject: Tillbridge Solar : Lincolnshire County Council Scoping Response
Date: 31 October 2022 17:50:55
Attachments: [2021 Planning General Corporate Letter Template.pdf](#)
[LFR Position Statement BESS Sep 2022.pdf](#)

Good evening,

Further to your letter dated 3rd October 2022 inviting comments in respect of the scoping opinion sought by Tillbridge solar, I attach the Council's response together with standing advice issued by Lincolnshire Fire and Rescue for battery storage which is referenced in the scoping response.

I trust this is helpful to you.

Neil McBride
Head of Planning

Lincolnshire County Council,
County Offices, Newland, Lincoln LN1 1YL

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Newland
Lincoln LN1 1YL
Tel: [REDACTED]
E-Mail: [REDACTED]

Date: 31 October 2022

Dear Sir/Madam

Planning Act 2008 (As Amended) and Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA) Regulations 10 and 11

Application by Tillbridge Solar Ltd for an Order granting Development Consent for the Tillbridge Solar Scheme (Proposed Development)

Scoping Opinion Under the Infrastructure Planning Regulation 2017

Thank you for your letter dated 3rd October 2022 for the above project.

The Council understands that its views are sought on a statutory consultee on the scoping opinion that has been submitted to the Secretary of State pursuant to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

The Council have reviewed the information provided and have the following comments to make.

Section 1 **Introduction** – no issues to raise in respect of the Local Plan documents cited or the EIA methodology proposed.

Section 2–**Site Description** – Note that the constraints plan included shows that the land is largely agricultural land classification Grade 3

Section 3 **Description of the Scheme** – On infrastructure, can a statement regarding the type of PV modules (mono facial or bifacial) be provided? Especially bifacial solar panels. There is a need for more information on the projected energy output from bifacial panels and the embodied carbon associated with such panels.

On infrastructure, fixed and single-axis tracking PV systems will be considered on the PV farm as mentioned in the scoping document. For the tracking PV systems, how does the increment in energy output differ from a fixed system, and what is the associated embodied carbon and maintenance carbon cost from tracking PV panels?

On BESS infrastructure, assuming the BESS capacity and land area allocated will be provided in the next set of documents. How will the BESS be mainly powered?

Section 4 **Alternatives** –. The developers timescale for applying for a DCO will be slightly behind other NSIP projects for solar projects in Lincolnshire which are registered on the National Infrastructure website hosted by PINS. These include Gate Burton, Cottam, West Burton, Temple Oaks and Heckington Fen which have all received Scoping Opinions from PINS.

It is essential that the ES for Tillbridge Solar considers cumulative effects of these known NSIPs specifically with regard to impact and loss of agricultural land. In terms of alternatives, consideration needs to be given to looking at the benefits of keeping the land, subject of this project, in agricultural use and the impact on food production in the region should the scheme proceed.

Schedule 4 (2) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states that an ES must include a description of its reasonable alternatives (e.g in terms of development design, technology, location, size and scale) considered by the developer which are relevant to the proposed project and its specific characteristics and an indication of the main reasons for selecting the chosen option including an comparison of the environmental effects.

In relation to agricultural land impacts size and scale are key factors which in the opinion of the Council require a sufficiently broad search area for the assessment of alternative locations to be sufficiently robust.

Therefore a Lincolnshire wide alternative assessment should be applied which as a minimum should scope in connection to alternative National Grid connection points which are available in Lincolnshire with specific consideration of agricultural land impacts. Without prejudice to that higher level assessment the Regulations also require an indication of the main reasons for selecting the chosen option. In this case this should include alternative site layouts (and indeed reduced MW as necessary) to reflect the location of known Best and Most Versatile land within the site.

Section 5 **Consultation** – No issue on the consultations undertaken to date.

Section 6 **EIA Methodology** - see comments on Section 4 above.

Section 7 **Air Quality** – No comments.

Section 8 **Climate Change** - What are the replacement rates assumed for the products used in the scheme, and how will their embodied carbon be estimated? How does the scheme intend to factor in the decarbonizing grid to their GHG emissions savings projections over the project's lifetime?

Section 9 **Cultural Heritage** – Have concerns particularly regarding the timely provision of sufficient information in accordance with the requirements of the National Planning Policy Framework and EIA Regulations.

It's vital that a competent full desk based assessment (DBA) be completed at the earliest opportunity as desk based work provides the basis for initial understanding. This is informed by and built upon by a full air photo/LiDAR assessment and geophysical survey which in turn assists in the development of the trial trenching programme. The full suite of archaeological evaluation is necessary to determine the archaeological potential and to inform an archaeological mitigation strategy which is reasonable, appropriate and fit for purpose.

The trial trenching will need to include not only trenching across known or suspected archaeology but also across the 'blank' areas to obtain baseline evidence where previous evaluation techniques have not identified archaeological remains. This is required to get a full understanding of the archaeology which will be impacted across the full impact zone and will inform the archaeological mitigation strategy which must be undertaken as part of the EIA.

Regarding **Relevant Legislation, Planning Policy and Guidelines**, the Lincolnshire Archaeology Handbook (2022) should be included which lays out the requirements for undertaking archaeological work in the County. EIA regulations should also be included in the Reference section and in the Legislation, Policy and Guidance section, and should be used as the basis for the EIA Environmental Statement.

Regarding the **Study Area and Baseline Conditions**, HER data for a 2km radius is required from the main site boundary **and any proposed connection route options**. Until they are descoped all connector route options need to be properly assessed as part of the development and as part of the Environmental Statement (ES).

All designated assets within a 5km radius should be taken into account for setting assessments. The significance of each asset must be assessed prior to scoping which assets would be affected. Modelling should particularly include any identified assets which have the potential to be visible or have their setting affected by the taller elements of the development.

Regarding the **Assessment Methodology**, the assessment of heritage assets and impacts within the landscape needs to begin from an understanding of the significance of each heritage asset in order to assess the potential impact of the development upon them and put forward any potential benefit or mitigation of proposed negative impact.

It is not just potential visual impact with views to, from and across any other heritage asset which may be affected and how it can be viewed from any point which is publicly accessible, it's also how the heritage asset is experienced kinetically and within its landscape. Assessment of all this must start with an understanding of the significance of each heritage asset and any interrelationships it may have with other heritage assets as well as the landscape in which it sits, for example remnant field boundaries of the field system that surrounded and supported a Medieval village.

Assessments of significance should be undertaken for all designated and undesignated assets which may be affected to ensure any assets subject to proposed descoping has an evidence base.

Section 9.30 concludes that ‘Where access cannot be obtained for this initial assessment, survey and/or evaluation work (as appropriate) will take place at a later date, once access has been arranged, but prior to main works commencing.’ The full suite of archaeological evaluation is required. The evaluation work must be completed in time to inform the mitigation strategy which will lay out how the developmental impact on archaeology will be dealt with, therefore this will need to be submitted as part of the EIA.

Section 9.31 states that *‘The precise scope and nature of the archaeological evaluation work will be informed via further analysis of the desk-based assessment’* While the results of the DBA will inform the further evaluation phases, the full suite of evaluation will be required. Section 9.31 goes on to say *‘this may include trial trenching.’* Please be advised that full trenching results are essential for effective risk management and to inform programme scheduling and budget management. Failing to do so could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided. A programme of trial trenching is required to inform a robust mitigation strategy which will need to be agreed by the time the Environmental Statement is produced and submitted with the DCO application.

Regarding **Sources of Information**, please be advised that archaeological reports, relevant documents from the Portable Antiquities Scheme (PAS) data must also be consulted. Map regression should include all available maps to provide a reasonable understanding of the development and time depth of the sites. A full competent LiDAR and air photo assessment including analysis and interpretation is required with full aerial photo coverage using all available oblique and vertical air photos including the Historic England Archive and Cambridge University Collection of Air Photos as well as RAF and Ordnance Survey photos including those held by Lincolnshire County Council.

In conclusion, the EIA will require the full suite of comprehensive desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by **Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d))**, **National Planning Statement Policy EN1 (Section 5.8)**, and the **National Planning Policy Framework**.

Section 10 **Ecology** – No comments to make

Section 11 **Flood risk, Drainage and Surface Water** – proposes the correct methodology for assessment of surface water flood risk to be completed for the ES.

Section 12 **Human Health** – No comment to make

Section 13 **Landscape and Visual Impact** - Overall, expect that the assessment of potential Landscape and Visual matters and evolving proposals relating to the Tillbridge Solar Project, as a Nationally Significant Infrastructure Project (NSIP), follow an iterative process of engagement and consultation to ensure the following

are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings:

- Landscape and Visual Impact Assessment (LVIA) Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (AVRs):
 - Quantity and location;
 - Phase depiction;
 - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (RVAA) should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

Also expect the production of the Landscape and Visual chapter of the Environmental Statement (ES), which would be in the form of a Landscape and Visual Impact Assessment (LVIA), and any supporting information (such as plans or figures) reflect current best practice and guidance from, as a minimum, the following sources:

- *‘Guidelines for Landscape and Visual Impact Assessment’*, (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- *‘An Approach to Landscape Character Assessment’*, Natural England (2014);
- *‘Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals’*, 17th September 2019 by the Landscape Institute (LI);
- *‘Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)’*, 10th January 2020 by the Landscape Institute (LI) ; and
- *‘Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations’*, May 2021 by the Landscape Institute (LI).

While the focus of this review is on Landscape and Visual matters, information provided within sections 1 to 6 have also been considered, providing background and context to the site. At this initial stage of the NSIP process, the content and level of information provided by the developer within *Section 13* (Landscape and Visual Amenity) are generally considered satisfactory, however, as stated previously, we would expect to discuss this content and approach as part of the iterative process, and the following should be considered in the evolving assessment and layout:

Viewpoints

There are fifteen draft representative viewpoints identified within paragraph 13.46/Table 13-1. However the final locations are to be reviewed and agreed with the Council and other relevant stakeholders. The final viewpoint selection should also consider views of taller and more conspicuous elements, such as battery storage or sub-stations once the layout is more developed, the cable route (once refined) as well as several “key views” identified within relevant Neighbourhood Plans.

Photomontages

To gain an understanding of the visibility of the development and how the panels and infrastructure would appear in the surrounding landscape, Photomontages/Accurate Visual Representations (AVRs) should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with the Council and other relevant stakeholders and produced in accordance with *TGN 06/19 Visual Representation of Development Proposals*. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

Methodology

As stated previously, the LVIA should be carried out in accordance with the GLVIA3 and undertaken by suitably qualified personnel. The methodology provided at *Section 13.62 to 13.90* is typical of those used for ES Chapters and standalone LVIA's where potential significant effects can be considered and reflects the guidance in GLVIA3. We would request that the most up to date technical guidance also be used, for example paragraph 13.72/Table 13-2 should be based on LI *TGN 2/21 Assessing landscape value outside national designations*.

Under Landscape Value (paragraph 13.72/Table 13-2), it is potentially implied that only designated landscapes may have a medium or high value. This is not the case, and GLVIA3 paragraph 5.19 states that “*value can apply to areas of landscape as a whole, or to the individual elements, features and aesthetic or perceptual dimensions which contribute to the character of the landscape*” and that “*the value attached to undesignated landscapes also needs to be carefully considered and individual elements of the landscape – such as trees, buildings or hedgerows – may also have value.*”.

Table 13-6 provides classifications of Visual Susceptibility; many of the surrounding lanes and tracks within the study area are also well used by dog walkers, horse riders and leisure cyclists, and subsequently the assessment should consider views (and susceptibility) from these groups from these locations who would likely be more susceptible to change than motorists.

Scope of the Study Area:

It is acknowledged that a Study Area (shown on Figure 13.1) covering 3km has been allowed for initially based on desktop and field study, and paragraph 13.6 indicates that views beyond 2km are limited to “*along Middle Street, above Glentworth and Harspswell, where longer-range views are likely to be available.*”. However, this appears to be based upon 3.5m high panels across the site and omits potential longer distance views of taller, more conspicuous elements such as such as battery storage or the substation (up to 12m in height).

Consequently, the ZTV at this stage may be unrepresentative of the full extent of potential visibility of the development, which would be updated once these elements are known (as stated within paragraph 13.5) and the study area should not be fixed until the full extents of visibility are known.

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

Do not consider that can provide more detailed feedback at this stage on the Cable Route Corridor until further information is provided, and would expect the LVIA to provide a clear evaluation and likely impacts of any route. The scoping report details cables would be underground, however if there are any sections of overhead cable or other associated above ground equipment or features, this should be clearly identified and considered within the LVIA to understand the extent of this and where any potential viewpoints may be required. We would encourage any overhead cables be avoided or reduced to minimise visual intrusion.

Landscape

Published landscape character areas have been identified, however to align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and likely need to include a finer grain landscape assessment that includes the Site and immediate area that also considers individual landscape elements or features that make up the character area.

It would be useful to take into account the information collated as part of the Historic landscape characterisation project: *The Historic Character of The County of Lincolnshire (September 2011)*, to ensure that the development is sensitive to the historic landscape. The project documents and the mapping can be accessed here: [Historic Landscape Characterisation – Lincolnshire County Council](#)

An HLF funded Landscape Partnership was carried out in the Trent Vale area in 2007-2013: the archived website is here: [Trent Vale Landscape Partnership](#). While the principle site is outside of this area, the cable route would cross the area and it

would be useful to consider any effects that development of both the principle site and cable corridor may have on this area and the relevant priorities outlined in the reports:

- Trent Vale Landscape Conservation Management Plan (June 2013).
- Trent Vales Landscape Character Assessment:

Visual

The visual assessment should take account of the 'worst case scenario' in terms of winter views, and effects associated with landscape mitigation at the Operational Phase (year 1), Residual Phase with planting having established (10 to 15 years), and at the Decommissioning Phase.

The LVIA should ensure all elements associated with the development are considered and assessed, such as battery storage, sub-stations, CCTV poles and boundary fencing, which may be more visible than panels due to height, mass and extent.

Expect that the visual assessment would include for identification of visual receptors, and not just an assessment of any agreed viewpoints, which would clearly cross reference viewpoints to associated receptors.

Cumulative impacts

Cumulative Landscape and Visual effects should be assessed, particularly in regards to the Cottam Solar Project, West Burton Solar Project and Gate Burton Energy Park, which are in close proximity.

Mitigation and Layout

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate. Also expect the landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Any Landscape Scheme and associated Outline Management Plan should accompany the ES.

Section 14 **Noise and vibration** – No comment to make at this stage.

Section 15 **Socio -economics and Land Use** - . Based on the Socio-Economic section of the Socio Economic and Land Use chapter that is what expected to see and the assessment methodology in this section appears reasonable, will be able to comment in further detail as the exercise progresses. At this stage no comment is

provided in response to the Public Rights of Way but will provide further comments at the next stage.

Section 16 **Transport and Access** – proposes the correct methodology for assessment of impacts related to transport and access.

Section 17 **Other Environmental Topics** - The proposed development is partially located within Mineral Safeguarding Areas (MSA) for **Sand and Gravel** and **Limestone** and is therefore subject to **Policy M11 (Safeguarding of Mineral Resources)** of the Lincolnshire Minerals and Waste Local Plan: Core Strategy and Development Management Policies - adopted June 2016. The Core Strategy is available to download from the County Council's website: www.lincolnshire.gov.uk

Within a MSA, except for the exemptions set out in Policy M11, applications for non-minerals development should be accompanied by a Minerals Assessment.

The proposals also abut an existing mineral site (Glentworth K Oil Site) which is safeguarded by **Policy M12 (Safeguarding of Existing Mineral Sites and Associated Minerals Infrastructure)** of the Lincolnshire Minerals and Waste Local Plan: Core Strategy and Development Management Policies. Pre application discussions and pre application consultation for an extension to this site into land identified for this solar project have recently commenced.

Policy M12 safeguards existing mineral sites against development that would unnecessarily sterilise the sites or prejudice or jeopardise their use by creating incompatible land uses nearby.

When reviewing the submitted scoping report, it is noted that the Minerals and Waste Local Plan is identified as relevant local policy in para 1.15. Section 17 of the report notes that details of land designated for Mineral Safeguarding are included in a Phase 1 PRA (Appendix E), however this document appears to be geared towards pollution and contamination, and does not acknowledge the above policy requirements to consider the potential sterilisation of safeguarded mineral resources and any impacts on safeguarded mineral sites.

These matters should therefore be '**scoped in**' to the EIA and addressed as part of the ES/DCO application. We would only expect this to be proportionate to the proposals. We acknowledge for example that the vast majority of the PV site itself does not lie within a MSA, and the potential sterilisation of mineral resources may therefore be very limited.

The proposed cable route corridor, however, requires more detailed consideration. The search area for the cable route passes through the sand and gravel MSA situated between the A156 and River Trent. Whilst the final footprint of the grid connection may be limited, by dissecting the MSA it could introduce a constraint to the potential for any future extraction of the sand and gravel resources in the surrounding land. The ES/DCO application should therefore include consideration of this matter and it should be given due consideration when determining the final route of the grid connection. Consideration should be given, for example, to following

existing landscape features and infrastructure corridors, rather than crossing open fields and unconstrained land.

In respect of major accidents and disasters it is noted that for specific risks such as fire this is proposed to be incorporated into specific chapter topics although it is not clear which chapter will incorporate fire risk. It is requested that major accidents is scoped in to address in particular fire safety taking into consideration the following

1. The main solar panel aspect to the project appears to be located within Lincolnshire Fire & Rescue's, (LFRs) boundary, recognising that there is a cross over with Notts Fire & Rescue, and as such LFR will assume the lead for matters relating directly to them within the county.
2. For matters that relate to the county of Nottinghamshire, Nottinghamshire Fire and Rescue Service (NFRS) will assume the lead for matters relating directly to them.
3. As neighbouring Fire and Rescue Services, we will work together to ensure that any observations and comments are aligned.
4. Water supplies for use for fire fighting purposes;
5. Access to and around the site for attendance by emergency vehicles;
6. Operational emergency preparation including the completion of dedicated on site and off site emergency procedures;
7. Environmental Impacts caused by any fire on site and subsequent application of fire fighting media.
8. It would be beneficial if this section could consider in detail the matters highlighted in the attached document as part of its overall content.

The Council will continue to engage with this proposal as required and therefore any further queries, please do not hesitate to get in contact.

Yours faithfully

Neil McBride
Head of Planning

Chief Fire Officer: Mark Baxter

My Ref:

Fire and Police Headquarters
Deepdale Lane
Nettleham
Lincoln
LN2 2LT

Tel: (01522) 582222

Battery Energy Storage System (BESS) Requirements

Recognising that Lincolnshire Fire and Rescue (LFR) are statutory consultees as a result of the Planning Act 2008 and applications that involve 'National Significant Infrastructure Projects' (NSIPs), we will work and engage with the developer as project evolve, to ensure it complies with the statutory responsibilities that we enforce.

The developer should produce a risk reduction strategy (Regulation 38 of the Building Regulations) as the responsible person for the scheme as stated in the Regulatory Reform (Fire Safety) Order 2005. We would also expect that safety measures and risk mitigation is developed in collaboration with LFR.

The strategy should cover the construction, operational and decommissioning phases of the project. During the construction phase the number of daily vehicle movements in the local area will significantly increase. The Service will want to view the transport strategy to minimise this impact and prevent an increase in the number of potential road traffic incidents. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.

LFR recognises the use of batteries (including lithium-ion) as Energy Storage Systems (ESS) is a new and emerging practice in the global renewable energy sector. As with all new and emerging practices within UK industry the Service would like to work with the developers to better understand any risks that may be posed and develop strategies and procedures to mitigate these risks.

The developer must ensure the risk of fire is minimised by:

Procuring components and using construction techniques which comply with all relevant legislation.

The inclusion of Automatic Fire Detection systems in the development design.

Including automatic fire suppression systems in the development design. Various types of suppression systems are available, but the Service's preferred system would be a water misting system as fires involving Lithium-ion batteries have the potential for thermal runaway. Other systems would be less effective in preventing re-ignition.

Including redundancy in the design to provide multiple layers of protection.

Designing the development to contain and restrict the spread of fire through the use of fire-resistant materials, and adequate separation between elements of the Battery Energy Storage System (BESS).

Developing an emergency response plan with LFR to minimise the impact of an incident during construction, operation and decommissioning of the facility.

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Ensuring the BESS is located away from residential areas. Prevailing wind directions should be factored into the location of the BESS to minimise the impact of a fire involving lithium-ion batteries due to the toxic fumes produced.

The emergency response plan should include details of the hazards associated with lithium-ion batteries, isolation of electrical sources to enable fire-fighting activities, measures to extinguish or cool batteries involved in fire, management of toxic or flammable gases, minimise the environmental impact of an incident, containment of fire water run-off, handling and responsibility for disposal of damaged batteries, establishment of regular onsite training exercises.

The emergency response plan should be maintained and regularly reviewed by the occupier and any material changes notified to LFR.

Environmental impact should include the prevention of ground contamination, water course pollution, and the release of toxic gases.

The BESS facilities should be designed to provide:

- Adequate separation between containers.
- Provide adequate thermal barriers between switch gear and batteries,
- Install adequate ventilation or an air conditioning system to control the temperature. Ventilation is important since batteries will continue to generate flammable gas as long as they are hot. Also, carbon monoxide will be generated until the batteries are completely cooled through to their core.
- Install a very early warning fire detection system, such as aspirating smoke detection/air sampling.
- Install Carbon Monoxide (CO) detection within the BESS containers.
- Install sprinkler protection within BESS containers. The sprinkler system should be designed to adequately contain and extinguish a fire.
- Ensure that sufficient water is available for manual fire-fighting. An external fire hydrant should be located in close proximity of the BESS containers. – The water supply should be able to provide a minimum of 1,900 l/min for at least 120 minutes (2 hours). Further hydrants should be strategically located across the development. These should be tested and serviced at regular intervals by the operator. If the site is remote from a pressure feed water supply, then an Emergency Water Supply (EWS) meeting the above standard should be incorporated into the design of the site e.g. an open water source and/or tank(s). If above ground EWS tanks are installed, these should include facilities for the FRS to discharge (140/100mm RT outlet) and refill the tank.
- The site design should include a safe access route for fire appliances to manoeuvre within the site (including turning circles). An alternative access point and approach route should be provided and maintained to enable appliances to approach from an up-wind direction.
- As the majority of BESS are remotely monitored, consideration should include the fixing of an Information Box (IB) at the FRS access point. The purpose of the IB is to provide information



for first responders e.g. Emergency Response Plan, to include water supplies for firefighting, drainage plans highlighting any Pollution Control Devices (PCDs) / Penstocks etc for the FRS. LFR are aware that large scale BESS is a fairly new technology, and as such risks may or may not be captured in current guidance in pursuance of the Building Regulations (as amended) and the Regulatory Reform (Fire Safety) Order 2005. This will highlight challenges the FRS have when responding to Building Regulations consultations. For this reason, we strongly recommend applying the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems.



From: [SM-MMO-SH - MFA Marine Consents \(MMO\)](#)
To: [Tillbridge Solar Project](#)
Subject: RE: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 20 October 2022 11:19:34
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)

Marine Licensing, Wildlife Licences and other permissions

-
Dear Sir/Madam,

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.

Applicants should be directed to the MMO's online portal to register for an application for marine licence

<https://www.gov.uk/guidance/make-a-marine-licence-application>

You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in English waters.

The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours.

A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

The MMO is a signatory to the [coastal concordat](#) and operates in accordance with its principles. Should the activities subject to planning permission meet the above

criteria then the applicant should be directed to the follow pages: [check if you need a marine licence](#) and asked to quote the following information on any resultant marine licence application:

- local planning authority name,
- planning officer name and contact details,
- planning application reference.

Following submission of a marine licence application a case team will be in touch with the relevant planning officer to discuss next steps.

Environmental Impact Assessment

With respect to projects that require a marine licence the [EIA Directive \(codified in Directive 2011/92/EU\)](#) is transposed into UK law by the [Marine Works \(Environmental Impact Assessment\) Regulations 2007 \(the MWR\)](#), as amended. Before a marine licence can be granted for projects that require EIA, MMO must ensure that applications for a marine licence are compliant with the MWR.

In cases where a project requires both a marine licence and terrestrial planning permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations <http://www.legislation.gov.uk/ukSI/2017/571/contents/made> may be applicable.

If this consultation request relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link

<https://www.gov.uk/guidance/make-a-marine-licence-application>

Marine Planning

Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. MMO as such are responsible for implementing the relevant Marine Plans for their area, through existing regulatory and decision-making processes.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions.

At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

A [map](#) showing how England's waters have been split into 6 marine plan areas is available on our website. For further information on how to apply the marine plans

please visit our [Explore Marine Plans](#) service.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the [UK Marine Policy Statement](#) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#). If you wish to contact your local marine planning officer you can find their details on our [gov.uk page](#).

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below;

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.


If you require further guidance on the Marine Licencing process, please follow the link <https://www.gov.uk/topic/planning-development/marine-licences>

Regards
Andy

Andy Davis| Administration Officer Business Support Team | Marine Management Organisation

Lancaster House, Hampshire Court, Newcastle Business Park, Newcastle upon Tyne, NE4 7YH

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MARTON & GATE BURTON PARISH COUNCIL

Clerk to the Council: Mrs G Martin, 6 Mount Pleasant Close, Marton.

Email: magbparishcouncil@hotmail.co.uk Telephone: 01427 718377.

Dear Sirs,

Marton & Gate Burton Parish Council would like to comment on the number of solar farms being proposed for the West Lindsey and surrounding areas.

Whilst it is recognised that the established Power Station sites at West Burton and Cottam provide the necessary infrastructure to connect the solar farms to the grid, the number of proposed solar farms in this area is excessive, as is the combined acreage of good quality agricultural land that would be taken out of food production.

Global prices and availability of even basic crops such as wheat shows how vitally important it is that the UK produces as much of its own food as possible. War, flooding and drought have shown that we cannot rely on other countries to grow our food. Home food production also cuts down on "food miles" thus reducing damage to the environment from the emissions associated with transportation. The solar farm developers say that the land under consideration is low quality land, but this land has still produced valuable crops for generations.

There is already a heavy loss on productive agricultural land due to the demand for more housing without more loss from solar panels.

Agriculture is very important to the economy and way of life to a rural County like Lincolnshire. Many farmers are tenants on the land they farm and so have no say over the land being turned over to solar panels and they would lose their livelihood, causing unemployment and increasing social deprivation.

The solar farm developers maintain that soil conditions and insect life improve as a result of less human involvement in the land, but so will pernicious and invasive weeds.

Animal life would suffer as natural food supplies would be reduced and their traditional migratory corridors would be impeded.

For centuries there has been a beautiful view from Lincoln Ridge, across the Trent Valley and over to Nottinghamshire. If the solar farm companies get their way, this beautiful vista will be replaced by a sea of ugly panels. In turn, this could impact on tourism for the area, which could again result in loss of income and increased social deprivation.

Although not all the proposed solar farms are in the immediate vicinity of our villages of Marton and Gate Burton, the cable routes for ALL of the proposed developments would pass through our Parish in order to link to the Power Station sites on the other side of the River Trent. This area has Roman heritage related to it, the A1500 being the Roman road known as Tillbridge Lane. The local Planning Authority requires archeological surveys to be undertaken before any development is allowed in the vicinity of the river and we hope that our Roman heritage and the potential for any archeological remains will not be overlooked if the cable routes are underground.

The Parish Council requests that the Inspectorate takes these points in consideration when making a decision on these applications.

Yours faithfully,
Gillian Martin,
Clerk to Marton & Gate Burton Parish Council.



Ministry of Defence

Kate Norris
The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Defence Infrastructure Organisation

Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Tel: [REDACTED]

E-mail: DIO-safeguarding-statutory@mod.gov.uk

www.mod.uk/DIO

Your reference: EN010142 - 000010
Our reference: DIO 10056499

12 October 2022

Dear Kate

MOD Safeguarding – RAF Scampton

Proposal: Application by Tillbridge Solar Limited (the Applicant) for an Order granting Development Consent for the Tillbridge Solar Scheme (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Location: Land south of Hempswell, Tillbridge, Gainsborough

Grid Ref: Easting 488581 Northing 390728

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

The application is a scoping report for the development of a solar farm with a cable route corridor, which will comprise the underground electrical infrastructure required to connect the Principal Site to national transmission system.

The application site occupies the statutory safeguarding zones surrounding RAF Scampton In particular, the aerodrome height and birdstrike safeguarding zones surrounding the aerodrome and is approx. 10.4km from the centre of the airfield.

After reviewing the application documents, I can confirm the MOD has no safeguarding objections to this proposal.

The MOD would be keen to see the specifications of the development on submission of the full application.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's document titled Tillbridge Solar EIA Scoping Report dated September. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

A solid black rectangular box used to redact the signature of Kaye Noble.

Kaye Noble
Assistant Safeguarding Manager
DIO Safeguarding

Complex Land Rights

Ellie Laycock

Development Liaison Officer

UK Land and Property

Tel: +

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:

tillbridgesolarproject@planninginspectorate.gov.uk

21 October 2022

Dear Sir/Madam

APPLICATION BY TILLBRIDGE SOLAR LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE TILLBRIDGE SOLAR SCHEME (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION REPONSE

I refer to your letter dated 3rd October 2022 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET). Having reviewed the scoping report, I would like to make the following comments regarding NGET infrastructure within or in close proximity to the current red line boundary.

NGET has high voltage electricity overhead transmission lines, and a high voltage substation within the scoping area. The overhead lines and substation form an essential part of the electricity transmission network in England and Wales.

Substation

- Cottam 400kV Substation
- Associated cables
- Associated fibre cable

Overhead Lines

- 4VE 400kV
Cottam – Keadby 1
Cottam – Keadby 2
Cottam – Grendon
Cottam – Staythorpe 2
- ZDA 400kV
Cottam – West Burton
High Marnham – West Burton
Cottam – Staythorpe
- 4VK 400kV
Cottam – Eaton Socon Wymondley 2
- 4ZM 400kV
Bicker Fen – Spalding North – West Burton
Bicker Fen – Walpole – West Burton

I enclose two plans showing the location of NGET's apparatus in the scoping area.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004)”.
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To download a copy of the HSE Guidance HS(G)47, please use the following link:
<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

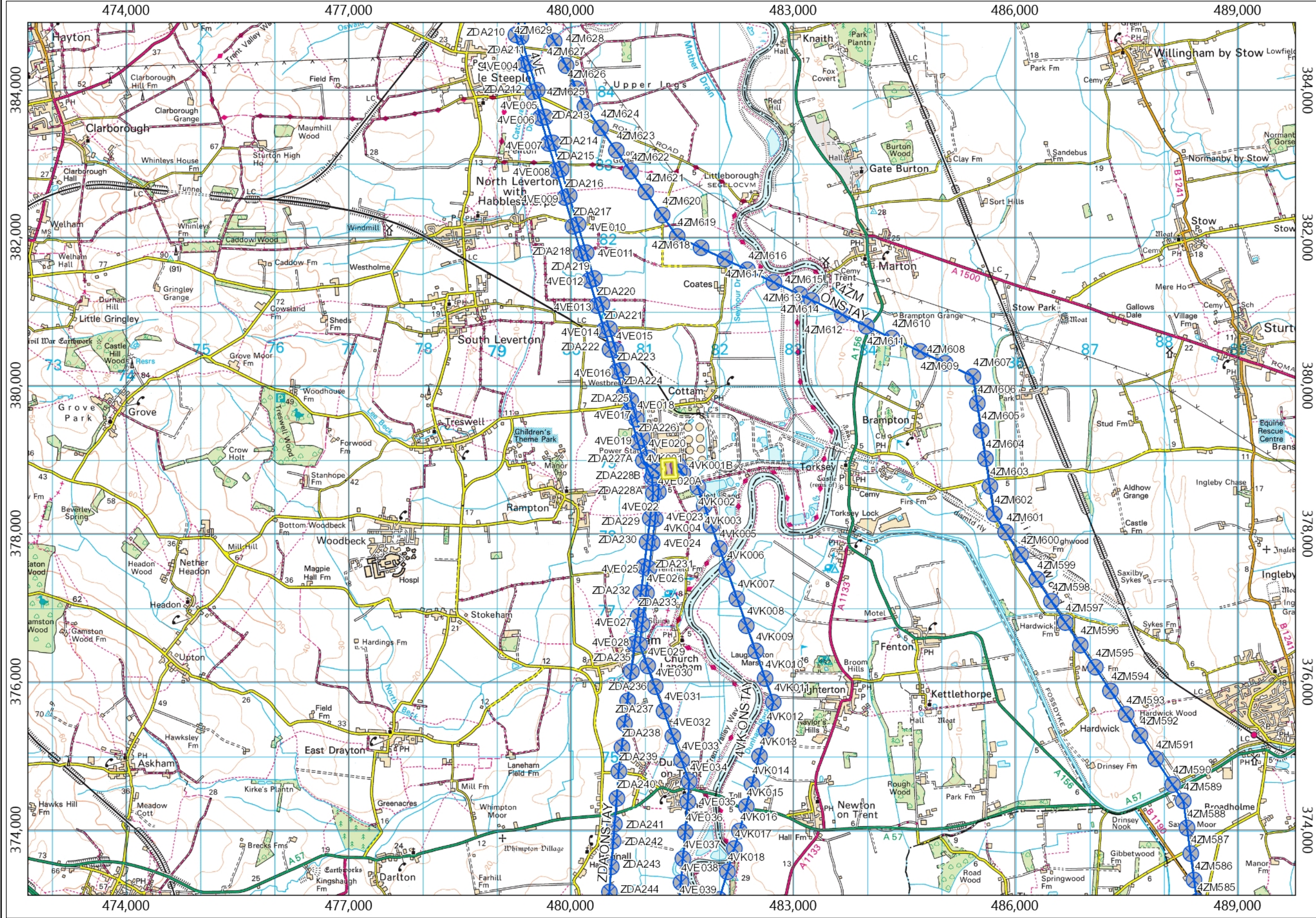
I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully



Ellie Laycock
Development Liaison Officer, Complex Land Rights



Legend:

- Substations Commissioned
- OHL 400kV Commissioned
- OHL 275kV Commissioned
- OHL 132kV & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Cable Tunnel
- Gas Operational Boundary
- Gas Site Boundary
- Trial Hole
- Vantage Point
- Aerial Marker Post
- Pipe Crossing Point
- CP Test Post
- Transformer Rectifier
- Pipeline Crossing
- Sleeve
- Nitrogen Sleeve
- Other Sleeves
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

Notes:
TILLBRIDGE SOLAR SCHEME NGET Assets Plan 1





Legend:

- Substations Commissioned
- Circuits
 - Commissioned
 - Decommissioned Group
 - Planned and Spares
- OHL 400kV Commissioned
- OHL 275kV Commissioned
- OHL 132kV & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Pillar
- Oil Tank
- Link Box
- Gauge
- Joint Bay
- Cable Joint
- Oil Pipe
- Cooling Pipe
- Cooling Station
- RAMM
- Cable Tunnel
- Gas Operational Boundary
- Gas Site Boundary
- Trial Hole
- Vantage Point
- Aerial Marker Post
- Pipe Crossing Point
- CP Test Post
- Transformer Rectifier
- Pipeline Crossing
- Sleeve
 - Nitrogen Sleeve
 - Other Sleeves
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

Notes:
TILLBRIDGE SOLAR SCHEME NGET Assets Plan 2





Our ref: EN010142-000010
Your ref: EN010142-000010

The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Via email:
tillbridgesolarproject@planninginspectorate.gov.uk

Catherine Townend
Spatial Planner
Midlands Operations Directorate

National Highways
The Cube
199 Wharfside Street
Birmingham
B1 1RN

Tel: [REDACTED]

04 October 2022

Dear Sir or Madam,

EIA Scoping Opinion – Tillbridge Solar Farm

Thank you for providing National Highways with the opportunity to respond on the Environmental Impact Assessment (EIA) scoping request for Tillbridge Solar Farm.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is in safeguarding the M180 located approximately 16km north of the site, the A46 trunk road, located approximately 18km to the south of the site, and the A1 trunk road located approximately 24km to the west of the site.

In responding to sustainable development consultations, we have regard to DfT Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans and development management proposals. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

We note that this consultation is in accordance with Regulations 10 and 11 and is the first pre-application consultation being undertaken to inform a subsequent Development Consent Order (DCO) application. It is understood that a DCO submission is necessary as the proposal is considered to be a Nationally Significant Infrastructure Project (NSIP) given the site's energy output is expected to exceed 50 Megawatts.

In relation to this Stage One consultation, National Highways has reviewed the submitted Scoping Report (dated September 2022). We understand from this that the Planning Inspectorate has identified National Highways as a consultation body which must be

consulted prior to adopting its Scoping Opinion and developing a subsequent Environmental Statement.

The below sets out our initial review of this proposal and the further information that we will require to fully consider the proposal's impact on our network:

National Highways' Considerations

Site Access and Boundary

It is noted that the site will be accessed directly from the SRN and is located far enough from the SRN that there should be no physical impacts to our network. Consequently, we have no comments regarding site access or boundary matters.

Operation - Traffic Impacts

It is anticipated that during normal operations there will be no more than 10 to 12 staff on site daily. In addition, it is anticipated that there could be an average of 10 to 20 visits per year with four-wheel drive vehicles, HGVs or transit vans for maintenance. In view of this, we are unlikely to have any concerns relating to traffic impacts on our network once the site is operational. However, the likely traffic and transport impacts of the operational site should still be set out and clearly evidenced in a Transport Statement (see below).

Construction - Traffic Impacts

National Highways will require information on the number of HGVs that will be travelling on the SRN to transport materials and equipment to the site. We also require an understanding of what route these vehicles will take to the site as well as the time of day they will likely be arriving and leaving.

Information regarding the access and exit routes and arrival/departure times of workers during the two-year construction period should also be provided to enable sufficient management of construction traffic and to minimise impacts on the SRN.

Recommended Transport Statement

In light of the above comments, we would expect any formal planning application to be accompanied by a Transport Statement prepared in accordance with Planning Practice Guidance on Travel Plans, Transport Assessments and Statements (March, 2014). In addition, due to the proximity of the site to the SRN, the Transport Statement should be produced in accordance with DfT Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development.

We suggest that the Transport Statement include the following:


- Development proposal details– information about the scale of the proposed development (and its construction) including any phasing, parking, access points, hours/days of operation, timescales for the construction period, and anticipated year of opening.
- Trip generation – information about the anticipated levels of traffic the development would generate. This should include a breakdown of staff commuting trips, and HGV/delivery trip generation for the operational and construction phases. The data should include a separate breakdown for the SRN peak hours, i.e., 08:00-09:00 (AM peak hour) and 17:00-18:00 (PM peak hour).
- Trip assignment – information about traffic routings (for construction and operational phases) in relation to the SRN. This should be presented in absolute numbers and percentages.
- Depending on the scale and distribution of new trips, it may also be necessary to indicate how traffic associated with the development proposal will impact on the SRN in the peak hours. These impacts should be considered for the site both as a standalone operation, and cumulatively with other nearby solar farm applications, (plus any wider committed developments), to consider whether the development will result in material implications for SRN junctions. Junctions of interest for the SRN are likely to be the M180 / A15, the A1 / 57 and the A46 / A57 junctions.
- Where further assessments are deemed necessary these should be carried out for the proposed opening year of the development (or where applicable, the start of construction).
- A separate Travel Plan should also be produced setting out how staff trips by private vehicle will be minimised as far as possible.

We recommend the above assessment work is agreed in a staged approach with the first stage being to agree the trip generation and trip distribution. This will determine if any further assessments with respect of the SRN are required.

We hope this is useful in the progression of the DCO application. If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely,



Catherine Townend
Midlands Operations Directorate
Email: 

From: [NATS Safeguarding](#)
To: [Tillbridge Solar Project](#)
Subject: RE: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation [SG34115]
Date: 04 October 2022 12:05:07
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)

Our Ref: SG34115

Dear Sir/ Madam

NATS operates no infrastructure within 10km of the application site. As such it anticipates no impact from the proposal and has no comments to make on the application.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



Date: 28 October 2022
Our ref: 408776
Your ref: EN010142



Katie Norris
The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
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BS1 6PN

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

BY EMAIL ONLY

Dear Katie Norris

Environmental Impact Assessment Scoping Consultation (Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11): Tillbridge Solar Project

Thank you for seeking our advice on the scope of the Environmental Statement (ES) for the Tillbridge Solar Project, in your consultation dated 03 October 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant a DCO.

Natural England have not had any pre-application engagement with this project. We consider there to be no *Major Designated Site* issues, however consider that the implications for Best and Most Versatile Agricultural Land to be of primary importance for this project, due to land take involved. England's full advice on the scope of Environmental Impact Assessments (EIA) is set out in Annex A below.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us. For any queries relating to the specific advice in this letter please contact Robbie Clarey at [REDACTED]. Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Robbie Clarey
Lead Adviser – East Midlands Area Delivery

Annex A

1. General Principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

From the Scoping report provided, Natural England consider that these general principles have been, or will be, appropriately addressed through the EIA process.

2. Environmental Data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

¹ National Infrastructure Planning (planninginsepctorate.gov.uk) Insert 2 – information to be provided with a scoping request, Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements

3. In-Combination/Cumulative impacts

The Environmental Statement should include in-combination/cumulative assessment. We welcome section 6.35 which notes that cumulative effects will be considered. The approach to in-combination assessment appears suitable and will take into account impacts from other development up to 10km away. The list of criteria to identify other development at section 6.44 is also suitable. Natural England are aware of a number of other Solar Projects in the surrounding area, some of which also propose to connect to the Grid at Cottam Power Station. These include **West Burton Solar Project, Cottam Solar Project and Gate Burton Solar Project**. These should be included within the in-combination assessment.

4. Impact of the proposed development on designated sites

Internationally & Nationally designated sites:

- The EIA Scoping report (Section 10.5) uses a 10km search area for European designated sites and 30km for European designated sites with bats listed as a notified feature. No such sites were identified in this search area.
- The EIA Scoping report (Section 10.5) uses a 2km search area for Nationally designated sites. One SSSI, Ashtons Meadow, was identified within this area.

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov. Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Section 5.2.1 of the Scoping Report notes that the scheme sits outside the IRZ for solar development for Ashtons Meadow SSSI, but despite this, section 5.2.2 states that indirect impacts to the SSSI will be assessed fully. Ashtons Meadow SSSI is designated for its neutral grassland interest, which may be susceptible to changes in air quality. Due to the immobile nature of the interest features of the site, and relatively large distance to the development site (approx. 1km) we consider impacts to be unlikely, but continue to welcome the intention to rule out any impacts within the ES.

Locally designated sites:

Whilst Natural England do not hold information regarding locally designated sites, we consider that the ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks.

5. Loss of Agricultural Land (BMV)

It is recognised that due to the nature of the solar panels a good proportion of the agricultural land affected by the development will not be *permanently* lost. However, the large development area and 40 year development lifetime give rise to additional concern with regard to agricultural productivity. In order to both retain the long term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its important functions and services (ecosystem services) as possible. Section 3.66 of the scoping report uses language such as 'should the scheme be decommissioned...'; Natural England consider that potential for a longer term loss of agricultural land should also be included within any assessment where the 40 year lifespan is not definite.

It is acknowledged that section 15.22 states that an ALC survey will be undertaken to inform a baseline assessment of Best and Most Versatile Agricultural Land and section 3.59 states that soil

removal will be considered within the Construction Environment Management Plan. Natural England advise the following issues should be considered and included as part of the Environmental Statement (ES):

- The quantity and quality of land that will be permanently and temporarily lost to the development. This should include the cable route. The ALC survey should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- Details of how any adverse impacts on soils, in particular BMV agricultural land, can be avoided or minimised through site design/masterplan. As well as details of how soils will be sustainably used and managed on site. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts. Mitigation should include reference to the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#).
- Details of any proposed agricultural use of the site during the operational phase, and details of intended restoration following decommissioning.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#). Further guidance is also set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

6. Protected Species

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

7. Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

8. Biodiversity Net Gain

Section 10.17-10.19 shows that a BNG assessment will be undertaken using the latest version of the Biodiversity Metric (currently 3.1) in line with the requirements of the Environment Act. We note that the Environment act requires habitats to be secured for at least 30 years. Section 3.63 states that 'A Framework Biodiversity and Landscape Management Plan will set out the principles for how the land will be managed throughout the operational phase, following the completion of construction. A detailed Biodiversity and Landscape Management Plan will be produced following grant of the DCO and prior to the start of construction'. Due to the 40 year lifespan of the development, this management plan is likely to fulfil the 30 year management requirement of BNG habitats.

We recommend that all habitat creation on site should be designed to compliment the surrounding area, enhancing existing features, improving connectivity across the development area and contributing to the Nature Recovery Network.

9. Decommissioning and After use

The ES should include details of the decommissioning and after use of the site, with details relating to proposed methods of restoration of land to agricultural use – which should be of an equal grade to the pre-development ALC grading.

Section 6.34 states that a Framework DEMP will be included in the ES. We acknowledge that this will require some assumptions to be made, as a result of the uncertainty introduced by the time elapsing during the operational phase. Nonetheless, alongside setting out the basis for protecting habitats and species during decommissioning, this should provide the framework for ensuring soil resources are protected.

There is additional uncertainty regarding decommissioning due to the potential establishment of important habitats during the operational phase. The ES should include a framework to enable the most valuable habitats to be retained through – CHECK S42

The loss of created habitats in order to revert to agriculture after 40 years of operation could have a negative impact on biodiversity, habitats and species which have established in the operational period. We acknowledge the difficulty in pre-planning for a scenario 40 years into the future, but consider that the ES should include provision for new surveys and assessment to inform any additional mitigation/compensatory measures to be implemented prior to any reinstatement works occurring. We would also encourage the retention of areas of particular biodiversity value, i.e. widened field boundaries/buffer areas, and/or compensatory habitat being provided off-site.

10. Impact on local landscapes

The Development site does not lie within or in close proximity to any nationally designated landscapes, however the EIA should include a full assessment of the potential impacts of the development on local landscape character. Section 13.3 outlines the intention to carry out an LVIA in line with GLVIA3, which Natural England would endorse.

The assessment should include the cumulative effect of the development with other relevant existing or proposed developments in the area.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

From: [Town Planning LNE](#)
To: [Tillbridge Solar Project](#)
Subject: Ref EN010142-000010 - Tillbridge Solar Scheme
Date: 28 October 2022 10:00:39
Attachments: [image001.png](#)

Network Rail Consultation Response

FAO:	The Planning Inspectorate
Date:	28 October 2022
Application reference:	EN010142-000010
Proposal:	Tillbridge Solar Scheme Scoping Opinion
Location:	Tillbridge Solar Scheme

Thank you for your recent correspondence relating to the above scoping consultation.

Network Rail is a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates, maintains and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests, will need to be carefully considered.

Impact on Network Rail Infrastructure

With reference to the protection of the railway, the Environmental Statement should consider any impact of the scheme upon the railway infrastructure and upon operational railway safety. In particular, it should include a Glint and Glare study assessing the impact of the scheme upon train drivers (including distraction from glare and potential for conflict with railway signals). It should also include a Transport Assessment to identify any HGV traffic/haulage routes associated with the construction and operation of the site that may utilise railway assets such as bridges and level crossings during the construction and operation of the site.

In addition, should any part of the scheme require the use of, or access across railway land including the operational railway itself, the developer will be required to obtain the necessary agreements and consents (easement agreements, licences etc) from Network Rail going forward. We would strongly recommend that they engage with us early in the development of their scheme to ensure such matters are resolved well in advance.

Summary

Network Rail would be grateful if the comments above are considered by The Planning Inspectorate. Network Rail would welcome further discussion and negotiation with The Planning Inspectorate and Tillbridge Solar Limited in relation to the proposed development as required going forward. If you have any questions or require more information in relation to the above please let me know.

Kind regards



Matt Leighton
Town Planning Technician
Diversity and Inclusion Champion
Network Rail Property - Eastern Region
George Stephenson House, Toft Green, York, YO1 6JT

Please note I am on study leave on Wednesdays for the foreseeable future and will be unavailable on these days

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN.
.....

Katie Norris
EIA Advisor
On behalf of the Secretary of State

www.newark-sherwooddc.gov.uk

Telephone: 01636 650000
Email: planning@nsdc.info

By email to tillbridgesolarproject@planninginspectorate.gov.uk

Date: 18 October 2022
Application ref: 22/01910/NPA

Dear Ms Norris

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Tillbridge Solar Limited (the Applicant) for an Order granting Development Consent for the Tillbridge Solar Scheme (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.

Proposal: Scoping opinion for proposed Tillbridge Solar farm. For further details please follow this link <https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/tillbridge-solar-project/?ipcsection=docs>

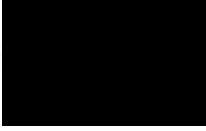
Site Address: Tillbridge Solar Scheme, Land To The South Of Harpswell Lane (A631)

I refer to the above consultation received by this Authority on 03 October 2022.

The site, as described within Chapter 2 of the Tillbridge Solar EIA Scoping Report dated September 2022, is located outside of Newark and Sherwood District. The proposed areas of solar panels, associated development and preferred cable route corridor, would be sited to the north and north east of Cottam Power Station, which is located approximately 8.0km north west of the nearest district village of Thorney. Following a review of the EIA Scoping Report, I can confirm that Newark and Sherwood District Council has no comments to make on the information to be provided in an Environmental Statement (ES) relating to the Proposed Development.

Please note that this matter has not been formally reported to the District Council's Planning Committee. In these circumstances the comments are those of an Officer of the Council under delegated power arrangements.

Yours sincerely,



Lisa Hughes
Business Manager – Planning Development

From: [LINCS-SECTION106 \(NHS LINCOLNSHIRE ICB - 71E\)](#)
To: [Tillbridge Solar Project](#)
Subject: FW: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 05 October 2022 13:51:22
Attachments: [image001.png](#)
[image002.png](#)
[EN01010142 - Tillbridge Solar - Statutory Consultation.pdf](#)

Good Afternoon

Thank you for sharing the EIA Scoping Notification & Consultation for Tillbridge Solar.

The ICB notes the work but do not have any comments at this time.

Kind Regards

Emily

Emily Turk
S106 Administrator

NHS Lincolnshire Integrated Care Board

Tel: 07581 012664

My working days are: Monday, Wednesday & Thursday

From: [REDACTED]
To: [Tillbridge Solar Project](#)
Cc: [REDACTED]
Subject: PINS reference: EN010142 Tillbridge Solar Project
Date: 06 October 2022 15:13:01
Attachments: [image062428.png](#)
[image389812.png](#)
[image879011.png](#)
[image869695.png](#)

Dear Katie

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) - Regulations 10 and 11 - the Tillbridge Solar Scheme (The Proposed Development)

Our reference: 22/0571/PREAPP

PINS reference: EN010142

Thank you for consulting North Kesteven District Council on the above scoping report for the Tillbridge Solar Scheme. The Council's comments are restricted to those concerning agricultural land impacts including cumulative effects. As you know there are a number of registered NSIP projects proposing large scale solar farms across Lincolnshire, Bassetlaw and Rutland. This includes the Heckington Fen solar farm in North Kesteven District.

We note that paragraph 15.37 of the Scoping Report states that an Agricultural Land Classification (ALC) soil survey will be undertaken for the land parcels within the Scheme Boundary and that this will be used to inform the assessment of the impact of the potential loss of agricultural land (including BMV agricultural land) arising from the Scheme. The Council suggests that consistent with Natural England guidance dated February 2021 ([Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#)) for a detailed ALC assessment, a soil specialist should normally make boreholes at every hectare on a regular grid on agricultural land in the proposed development area. In addition, we request that the Scoping Opinion requires the applicant to assess cumulative agricultural land use/BMV impacts alongside all other registered NSIP project solar farms across Lincolnshire, Bassetlaw and Rutland.

The Council is satisfied that given the significant separation distance between the proposed Tillbridge Solar Scheme and the Heckington Fen Solar Park that there will be no other cumulative effects with Heckington Fen Solar Park which need to be factored into the ES; other than cumulative agricultural land use/BMV impacts.

Thank you again for consulting North Kesteven District Council,

Regards

Nick Feltham

Nick Feltham
Assistant Development Manager



Tel: 01529 414155

Email: [REDACTED]

www.n-kesteven.gov.uk

Kesteven Street, Sleaford, NG34 7EF

There's a range of services available at

n-kesteven.gov.uk

You can check eligibility for help, report a problem near you, find your bin collection days, change Council Tax details, look at recycling advice and more, all on our website.



From: clerk@northlevertonwithhabblesthorpeparishcouncil.gov.uk
To: [Tillbridge Solar Project](#)
Subject: RE: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 05 October 2022 08:54:22
Attachments: [image001.png](#)
[image003.png](#)

Good morning

This matter was considered by North Leverton with Habblesthorpe Parish Council at their meeting on Monday 3 October 2022. The Parish Council have no comments to make on this consultation.

Kind regards

Anne Pallett
Parish Clerk
North Leverton with Habblesthorpe Parish Council
Tel: [REDACTED]

I work flexibly, and you may receive emails from me outside of core hours. I do not expect you to read or respond to my email outside of your own hours of work.

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From: [BCW Planning](#)
To: [Tillbridge Solar Project](#)
Subject: RE: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 05 October 2022 10:29:21
Attachments: [image004.png](#)
[image005.png](#)

Good morning,

Thank you for consulting us on the above application.

Wellingborough have no comments or objections.

Kind regards

Planning Admin | planning.bcw@northnorthants.gov.uk

North Northamptonshire Council

Swanspool House, Doddington Road, Wellingborough, Northants, NN8 1BP

T: 0300 126 3000 | DD: [REDACTED]

Twitter: @NNorthantsC

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Web: www.northnorthants.gov.uk



Creating safe and thriving places

From: [Before You Dig](#)
To: [Tillbridge Solar Project](#)
Subject: RE: EXT:EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 05 October 2022 13:05:56
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)

Good Afternoon,

NGN has a number of gas assets in the vicinity of some of the identified “site development” locations. It is a possibility that some of these sites could be recorded as Major Accident Hazard Pipelines(MAHP), whilst other sites could contain High Pressure gas and as such there are Industry recognised restrictions associated to these installations which would effectively preclude close and certain types of development. The regulations now include “Population Density Restrictions” or limits within certain distances of some of our “HP” assets.

The gas assets mentioned above form part of the Northern Gas Networks “bulk supply” High Pressure Gas Transmission” system and are registered with the HSE as Major Accident Hazard Pipelines.

Any damage or disruption to these assets is likely to give rise to grave safety, environmental and security of supply issues.

NGN would expect you or anyone involved with the site (or any future developer) to take these restrictions into account and apply them as necessary in consultation with ourselves. We would be happy to discuss specific sites further or provide more details at your locations as necessary.

If you give specific site locations, we would be happy to provide gas maps of the area which include the locations of our assets.

(In terms of High Pressure gas pipelines, the routes of our MAHP’s have already been lodged with members of the local Council’s Planning Department)

Kind regards,

Lucy McMahon

Administration Assistant
Before You Dig
Northern Gas Networks
1st Floor, 1 Emperor Way
Doxford Park
Sunderland
SR3 3XR

Before You Dig: 0800 040 7766 (option 5)
www.northerngasnetworks.co.uk

This matter is being dealt with by:

Nina Wilson

Ref: EN010142-000010

T [REDACTED]

E [REDACTED]

W nottinghamshire.gov.uk

Sent via email to:

tillbridgesolarproject@planninginspectorate.gov.uk

21st October 2022

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by Tillbridge Solar Limited (the Applicant) for an Order granting Development Consent for the Tillbridge Solar Scheme (the Proposed Development) Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your email dated 3rd October 2022 requesting strategic planning observations on the above planning application. I have consulted with my colleagues across relevant divisions of the County Council and have the following comments to make.

In terms of the County Council's responsibilities there are a number of elements of national planning policy and guidance that are of particular relevance in the assessment of planning applications these include Minerals and Waste, Education, Transport and Public Health.

County Planning Context

Transport

NCC would expect the DCO application to be supported by a Transport Assessment prepared in accordance with Planning Practice Guidance with a chapter specifically dealing with the cable routing corridor in Nottinghamshire and would also expect the proposed Construction Environmental Management Plan to include the cable route corridor. The opportunity to share cabling infrastructure with the other DCO solar schemes in the area should be explored.

Flood Risk Management

The County Council has no comments to make with regards to Flood Risk Management at this stage of the application.

Minerals and Waste

The adopted Nottinghamshire and Nottingham Replacement Waste Local Plan, Part 1: Waste Core Strategy (adopted 10 December 2013) and the saved, non-replaced policies of the Waste Local Plan (adopted 2002), along with the adopted Nottinghamshire Minerals Local Plan (adopted March 2021), form part of the development plan for the area. As such, relevant policies in these plans need to be considered. In addition, Minerals Safeguarding and Consultation Areas (MSA/MCA) have been identified in Nottinghamshire and in accordance with Policy SP7 of the Nottinghamshire Minerals Local Plan, these should be taken into account where proposals for non-minerals development fall within them.

The County Council notes the reference to Local Planning Policy and the Adopted Nottinghamshire Minerals Local plan March 2021 and the emerging Nottinghamshire and Notting Waste Local Plan. The county council accepts that Local planning Policy issues will be addressed as part of the DCO application with 'The Planning Statement'. However, would wish to draw attention to the following points:

Minerals

As the Mineral Planning Authority, it is the responsibility of Nottinghamshire County Council to form policies and determine applications relating to mineral development. One of the key responsibilities of both the County Council but also the District and Borough Councils is to safeguard mineral resource (PPG, Paragraph 005, 2014). As minerals are a finite resource that can only be worked where they are found, the emerging Minerals Local Plan contains a policy, **SP7**, [Adopted Minerals Local Plan | Nottinghamshire County Council](#) which seeks to safeguard mineral resource from unnecessary sterilisation from non-mineral development and so establishes Mineral Safeguarding and Consultation Areas (MSA/MCA).

As a two-tier authority, the Minerals Local Plan forms part of the overall Development Framework for Bassetlaw District Council.

The specifics relating to 'Cottam Solar Farm' and the cabling options for connection to the national grid.

The entire of western side of River Trent lies within a Sand and Gravel Mineral Safeguarding Area, but that given relatively small land take we do not foresee any problems.

There is an area of concern, however. The northern cabling route option, the buffer zone for which, runs close to the permitted sand and gravel site at Sturton Le Steeple quarry (1/46/06/00014/). This site is operated by TARMAC. As this site is not presently active, it may not have been picked up as part of the initial scoping exercise. NCC would draw attention to Adopted Minerals Local Plan March 2021 (**Policy MP2c**) and Policies Map Inset 4. [Adopted Minerals Local Plan | Nottinghamshire County Council](#)

Sturton le Steeple Quarry is an important source of sand and gravel and is a significant contributor to the resource landbank, as identified within the Adopted Nottinghamshire Minerals Local Plan March 2021.

Waste

In terms of the Waste Core Strategy, there are no existing waste sites within the vicinity of the site whereby the proposed development could cause an issue in terms of safeguarding existing waste management facilities (as per Policy WCS10).

Public Health

Public Health note that any further specific health impacts arising from the proposed development, either negative or positive, on human health from the construction of the proposed Solar Farm are being considered as part of the scope of the EIA which include and are not limited to, health improvement impacts such as air quality and human health in relation to the social determinates of the built environment. NCC are supportive of these being included and have no further comments to make at this stage of the process.

Conclusion

It should be noted that all comments contained above could be subject to change, as a result of ongoing negotiations between the County Council, the Local Planning Authority and the applicants. These comments are based on the information supplied and are without prejudice to any comments the County Council may make on any future planning applications submitted for this site.

Should you require any further assistance in relation to any of these matters please do not hesitate to contact me.

Yours faithfully

Nina Wilson
Principal Planning Officer
Nottinghamshire County Council

This document is unsigned as it is electronically forwarded. If you require a signed copy, then please contact the sender.

From: [REDACTED]
To: [Tillbridge Solar Project](#)
Subject: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 12 October 2022 17:02:28
Attachments: [NFRS_RESPONSE-BESS Tillbridge.docx](#)

Dear Sir,

Please find the following observations as requested under the above project consultation.

1. The main solar panel aspect to the project appears to be located within Lincolnshire Fire Service and as such that authority will assume the lead for matters relating directly to them within the county.
2. For matters that relate to the county of Nottinghamshire, Nottinghamshire Fire and Rescue Service (NFRS) will assume the lead for matters relating directly to them.
3. As neighbouring Fire and Rescue Services, we will attempt to work together to ensure where possible that any observations tendered do not contradict thus causing confusion. It is likely however, that our comments and concerns on the matter in reality will be similarly aligned.
4. I have attached a copy of the documentation that NFRS has previously issued to developers with projects such as these with a view to helping to achieve a successful outcome for all.
5. I note that in the 'Tillbridge Solar EIA Scoping Report' there is mention of fire water tanks and suppression systems amongst other features particularly in sections 3.8 & 17.22, with reference to a further report on these specific areas to be produced. It would be beneficial if that could consider in detail the matters highlighted in the attached document as part of its overall content.
6. Once the finer detail is known, further informed responses could be offered as and when required to guide the project.
7. It is the location, size, distribution and comprehensive safety considerations afforded to any of the Battery Energy Storage Systems primarily that is the major concern for NFRS.

These comments are not intended to be interpreted as either an approval nor an objection to the proposed scheme. Should the detail of the scheme change, NFRS reserves the right to amend its submissions.

I trust this is to your requirements, if you feel anything is missing please do not hesitate to contact me direct.

Regards

Tom

Tom Clark
Station Manager
Fire Protection North - Mansfield Fire Station.
Nottinghamshire Fire & Rescue Service.

Battery Energy Storage System (BESS) Requirements

Nottinghamshire Fire and Rescue Service (NFRS) will work and engage with the developer as this project evolves to ensure it complies with the statutory responsibilities that we enforce.

The developer should produce a risk reduction strategy (Regulation 38 of the Building Regulations) as the responsible person for the scheme as stated in the Regulatory Reform (Fire Safety) Order 2005. We would also expect that safety measures and risk mitigation is developed in collaboration with NFRS.

The strategy should cover the construction, operational and decommissioning phases of the project.

During the construction phase the number of daily vehicle movements in the local area will significantly increase. The Service will want to view the transport strategy to minimise this impact and prevent an increase in the number of potential road traffic incidents. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.

NFRS recognises the use of batteries (including lithium-ion) as Energy Storage Systems (ESS) is a new and emerging practice in the global renewable energy sector. As with all new and emerging practices within UK industry the Service would like to work with the developers to better understand any risks that may be posed and develop strategies and procedures to mitigate these risks.

The developer must ensure the risk of fire is minimised by:

Procuring components and using construction techniques which comply with all relevant legislation.

Including Automatic Fire Detection systems in the development design.

Including automatic fire suppression systems in the development design. Various types of suppression systems are available, but the Service's preferred system would be a water misting system as fires involving Lithium-ion batteries have the potential for thermal runaway. Other systems would be less effective in preventing reignition.

Including redundancy in the design to provide multiple layers of protection.

Designing the development to contain and restrict the spread of fire through the use of fire-resistant materials, and adequate separation between elements of the Battery Energy Storage System (BESS).

Developing an emergency response plan with NFRS to minimise the impact of an incident during construction, operation and decommissioning of the facility.

Ensuring the BESS is located away from residential areas. Prevailing wind directions should be factored into the location of the BESS to minimise the impact of a fire involving lithium-ion batteries due to the toxic fumes produced.

The emergency response plan should include details of the hazards associated with lithium-ion batteries, isolation of electrical sources to enable firefighting activities, measures to extinguish or cool batteries involved in fire, management of toxic or flammable gases, minimise the environmental impact of an incident, containment of fire water run-off, handling and

responsibility for disposal of damaged batteries, establishment of regular onsite training exercises.

The emergency response plan should be maintained and regularly reviewed by the occupier and any material changes notified to NFRS.

Environmental impact should include the prevention of ground contamination, water course pollution, and the release of toxic gases.

The BESS facilities should be designed to provide

Adequate separation between containers.

Provide adequate thermal barriers between switch gear and batteries,

Install adequate ventilation or an air conditioning system to control the temperature. Ventilation is important since batteries will continue to generate flammable gas as long as they are hot. Also, carbon monoxide will be generated until the batteries are completely cooled through to their core.

Install a very early warning fire detection system, such as aspirating smoke detection/air sampling.

Install Carbon Monoxide (CO) detection within the BESS containers.

Install sprinkler protection within BESS containers. The sprinkler system should be designed to adequately contain and extinguish a fire.

Ensure that sufficient water is available for manual firefighting. An external fire hydrant should be located in close proximity of the BESS containers. – The water supply should be able to provide a minimum of 1,900 l/min for at least 120 minutes (2 hours). Further hydrants should be strategically located across the development. These should be tested and serviced at regular intervals by the operator. If the site is remote from a pressure feed water supply, then an Emergency Water Supply (EWS) meeting the above standard should be incorporated into the design of the site e.g. an open water source and/or tank(s). If above ground EWS tanks are installed, these should include facilities for the FRS to discharge (140/100mm RT outlet) and refill the tank.

The site design should include a safe access route for fire appliances to manoeuvre within the site (including turning circles). An alternative access point and approach route should be provided and maintained to enable appliances to approach from an up-wind direction.

As the majority of BESS are remotely monitored, consideration should include the fixing of an Information Box (IB) at the FRS access point. The purpose of the IB is to provide information for first responders e.g. Emergency Response Plan, to include water supplies for firefighting, drainage plans highlighting any Pollution Control Devices (PCDs) / Penstocks etc for the FRS.

NFRS are aware that large scale BESS is a fairly new technology, and as such risks may or may not be captured in current guidance in pursuance of the Building Regulations (as amended) and the Regulatory Reform (Fire Safety) Order 2005. This will highlight challenges the FRS have when responding to Building Regulations consultations. For this reason, we strongly recommend applying the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems.

Your ref: EN010142-000010

3/10/22

19 October 2022

Mrs Katie Norris

EIA Advisor

Environmental services

Central Operations

Temple Quay House

2 The Square

Bristol

BS1 6PN

Dear Mrs Norris

Springthorpe Parish Meeting wish to formally announce their opposition to the proposal by Tillbridge Solar Ltd to develop a solar farm on land adjacent to the villages of Springthorpe, Harpswell, Glentworth, Fillingham and Heapham in West Lindsey, Lincolnshire.

After carefully listening to the proposals made by Tillbridge Solar Ltd at a local Scoping Consultation Meeting and after carefully considering the arguments (including that for the demand for national energy security, together with the known science of solar farming) we have the following comments to make in support of our opposition to their proposed solar farm.

We strongly support the development of new and renewable sources of energy to support progress to national and global 'net.zero' to reduce climate chaos.

We are largely in favour of the use of solar power as part of this development (though some specific aspects of the recent Tillbridge Solar Ltd proposals give us some cause for concern: the panels will be constructed and shipped from China, thus reducing their benefits in terms of our own national employment and global carbon-neutrality).

We recognise that solar panels are 'land hungry' compared with other methods of renewable energy generation (particularly wind power).

The agricultural land around our village is currently classified as Grade 3b. However wheat yields of 4-11.06 tonnes/hectare have been recorded this year by our local farmers with comparable national norm-beating results for other food crops. We suspect that the quality and flexibility of the land in question is superior to the Grading indicated in the pre-planning information provided by Tillbridge Solar Ltd.

Bearing our support for renewables in mind our opposition to the proposed solar farm is rooted in the more important need for national food security. It does not make sense to take high-yielding agricultural land out of use for food production for at least the next forty years to produce the relatively paltry amounts of energy this proposed solar development would yield.

We would also wish to argue that it is spurious to consider the requirements of energy and food security to be mutually exclusive: if solar panels can be mounted anywhere (rooves, brownfield sites) and still produce the same amount of energy we can have both food security and energy security by using other sites than good arable land for energy production.

We make no apology for also advancing a moral argument specifically against the development of a solar farm in our Parish:

These proposals are detrimental to the viability of two local farms with their tenant farmers and employment that directly and indirectly attaches to them. Tenant farmers are relatively poorly compensated under the current proposals compared to landowners. The folk they employ or who run supply and support chains for these businesses are not compensated at all. It would be an

injustice to impose a development that disenfranchised local people to the benefit of distant landlords.

To further develop this moral argument:

The United Kingdom's contribution to global net zero is so small in comparison to that of other countries that achieving our own national net.zero may unfortunately not result in global net.zero attainment.

It makes no sense to 'sacrifice all' including the livelihoods of our friends and neighbours if there is a risk that to do so would not achieve net.zero for then we would have nothing left, not even self respect

Tillbridge solar ltd have produced their report of the Collaboration Workshop in September 2022. The report does not reflect the local scepticism that was evident at the meeting against the rationales advanced by Tillbridge Solar Ltd for the selection of our area for solar development. Their report fails absolutely to convey the depth and strength of feeling locally in favour of our multitude of reasoned arguments against such a development for which there was little reasoned response in return

We would urge Tillbridge Solar Ltd not to proceed with the proposal for their solar farm in West Lindsey and we would urge their representatives not to misrepresent the justifiable concerns of local residents with bland sounding reports that endeavour to dismiss reasoned argument against the proposals.

Yours Faithfully

Dr Gillian Procter

Chair Springthorpe Parish Meeting

From: [REDACTED]
To: [Tillbridge Solar Project](#); [REDACTED]
Subject: Statutory Consultation
Date: 24 October 2022 11:43:18

TORKSEY PARISH COUNCIL

01427 718388 answerphone

My Council wishes to inform you that it does not have any comments to make concerning the Tillbridge Solar Project.

Regards,
Roger Pilgrim.
Parish Clerk.

From: [REDACTED]
To: [Tillbridge Solar Project](#)
Cc: [REDACTED]
Subject: RE: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 31 October 2022 13:44:39
Attachments: [image004.png](#)
[image005.png](#)
[EN01010142 - Tillbridge Solar - Statutory Consultation.pdf](#)

Good afternoon Katie,

Thank you for your e-mail below.

I can confirm that Trinity House has no comments to make in this regard and further advise that we do not require receipt of any future correspondence relating to this project.

Kind regards,

Stephen Vanstone

Navigation Services Officer | Navigation Directorate | Trinity House

[REDACTED] | 0207 4816921

www.trinityhouse.co.uk



TRINITY HOUSE



Environmental Services
Central Operations Team
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email; tillbridgesolarproject@planninginspectorate.gov.uk

October 20th 2022

Ref; EN010142-000010

Scoping Consultation

Dear Katie,

We write in response to your letter dated 3 October 2022.

Uniper UK Limited own and operate the Cottam Development Centre which we understand may be impacted by the Tillbridge Solar Project.

At this stage it is not clear from the scoping report how the project will affect Uniper's assets.

We reserve our position to comment on any of the proposals submitted by the Applicant.

Yours sincerely,



Lucy Berry
Land Manager
Uniper UK Limited



Uniper UK Limited
Compton House
2300 The Crescent
Birmingham Business Park
Birmingham B37 7YE
www.uniper.energy

Uniper UK Limited

Registered in
England and Wales
Company No 2796628

Registered Office:
Compton House
2300 The Crescent
Birmingham Business Park
Birmingham B37 7YE



UK Health
Security
Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN010142
Our Ref: 60366CIRIS

Ms Katie Norris
EIA Advisor
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

31st October 2022

Dear Ms Norris

**Nationally Significant Infrastructure Project
Tillbridge Solar Scheme PINS Reference EN010142
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID. The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be

covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Recommendation

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

We note that the current proposal do not appear to include any information or consider the possible health impacts of Electric and Magnetic Fields (EMF).

The applicant should assess the potential public health impact of EMFs arising from any electrical equipment associated with the development. Alternatively, a statement should be provide explaining why EMFs can be scoped out. For more information on how to carry out the assessment, please see the accompanying reference for details¹.

Recommendation

We request that the ES clarifies this and if necessary, the proposer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or

¹
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

Human Health and Wellbeing - OHID

Human Health and Wellbeing

This section of OHID's response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted scoping report OHID wish to make the following specific comments and recommendations:

Methodology - Determination of significant effects

It is noted that Chapter 12 is drafted with reference to the London HUDU assessment approach and as such no assessment of significance is provided for human health. This is despite para 6.22 stating that:

"... The evaluation of the significance of an effect is important, since it is the significance that determines the resources that should be deployed in avoiding or mitigating a significant adverse effect, or conversely, the actual value of a beneficial effect..."

This approach does not conform to the requirements of the EIA Regulations and as such an assessment of significance will be required to form part of the ES. This is consistent with recent PINS approach to this issue within the SoS Scoping opinion for the National Highways M60/M62/M66 Simister Island scheme.

Regulation 18 4(b) requires an ES to 'include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment'. In addition, Schedule 4 (5) requires a description of the likely significant effects of the development on the environment resulting from, inter alia:

(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters).

Recommendation

The ES must provide an assessment of significance for those health determinants scoped into the population and human health chapter.

The population and human health assessment should draw upon the findings from other relevant chapters, including air quality and noise.

As there is not yet a define approach in England to the assessment of significance for population and human health, it is strongly advised that any proposed approach is agreed with OHID/UKHSA and the local Directors of Public Health. The guidance issued by the International Association of Impact Assessment (IAIA)² could be used as a basis for the assessment of significance.

Vulnerable Populations

An approach to the identification of vulnerable populations has not been provided. The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics.

The identification of vulnerable populations and sensitive populations should be considered.

Recommendation

Baseline health data should be provided, which is adequate to identify any local sensitivity or specific vulnerable populations. The identification of vulnerable populations should be based on the list provided by the Welsh Health Impact Assessment Support Unit³ and the International Association of Impact Assessment (IAIA)⁴.

Overlapping Schemes

Paragraph 15.28 identifies a spatial and temporal overlap with other proposed solar energy schemes, notably the cable corridors for Gate Burton Energy Park, Cottam Solar Project and West Burton Solar Project. The scoping report identifies the need to address this overlap within the cumulative effects assessment. Additional detail is required regarding the

² Cave, B., Claßen, T., Fischer-Bonde, B., Humboldt-Dachroeden, S., Martín-Olmedo, P., Mekel, O., Pyper, R., Silva, F., Vilianni, F., Xiao, Y. 2020. Human health: Ensuring a high level of protection. A reference paper on addressing Human Health in Environmental Impact Assessment. As per EU Directive 2011/92/EU amended by 2014/52/EU. International Association for Impact Assessment and European Public Health Association.

³ [WHIASU \(2020\). Health Impact Assessment – A Practical Guide](#)

⁴ Cave, B., Claßen, T., Fischer-Bonde, B., Humboldt-Dachroeden, S., Martín-Olmedo, P., Mekel, O., Pyper, R., Silva, F., Vilianni, F., Xiao, Y. 2020. Human health: Ensuring a high level of protection. A reference paper on addressing Human Health in Environmental Impact Assessment. As per EU Directive 2011/92/EU amended by 2014/52/EU. International Association for Impact Assessment and European Public Health Association.

opportunity to reduce the individual schemes effects by co-operation during the construction phase through the assessment of alternatives.

Recommendation

Any opportunity to reduce the individual schemes effects by co-operation during the construction phase should be investigated and reported, particularly opportunities to reduce the impact from cable corridors.

Housing Affordability and Availability

The scoping report identifies the potential number of peak construction workforce, but does acknowledge non-home based workers will require local accommodation.

The size of the construction workforce could be significant across schemes within the zone of influence, noting that the Burton Gate scoping report estimated a peak of 600 construction workers per day. The presence of significant numbers of workers could foreseeably have an impact on the local availability of affordable housing and tourist accommodation, particularly that of short-term tenancies and affordable homes for certain communities.

The cumulative effects assessment will need to consider this across the wider study area given the number of other NSIPs, but also identify the potential for any local effects. This may lead to a lack of affordable local accommodation for vulnerable residents with the least capacity to respond to change. For example, where there may be an overlap between construction workers seeking accommodation in the private rented sector, and people in receipt of housing benefit seeking the same lower-cost accommodation).

It should be noted the Housing Needs Assessment for Central Lincolnshire (2020)⁵ identifies the private rented sector plays a particularly key role (between 26%-29%) in accommodating those in lower paid roles, such as customer services, caring and leisure service occupations.

Recommendation

The peak numbers of construction workers and non-home-based workers should be established and a proportionate assessment undertaken on the impacts for housing availability and affordability and impacts on any local services.

Any cumulative effect assessment should consider the impact on demand for housing by construction workers and the likely numbers of non-home-based workers required across all schemes.

⁵ [Housing Needs Assessment Central Lincolnshire April 2020](#)

The assessment should also include potential impacts on tourist accommodation within the socio-economic assessment.

Yours sincerely

On behalf of UK Health Security Agency
nsipconsultations@ukhsa.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.



Guildhall
Marshall's Yard
Gainsborough
Lincolnshire DN21 2NA

Telephone 01427 676676
Web www.west-lindsey.gov.uk

Your contact for this matter is:
Russell Clarkson

[REDACTED]
01427 676641

31 October 2022

The Planning Inspectorate
Environmental Services, Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir/Madam,

APPLICATION REFERENCE NO: 145651

PROPOSAL: PINS consultation on behalf of the Secretary of State regarding information to be provided in an Environmental Statement, EN010142/000010

LOCATION: Tillbridge Solar Scheme

Thank you for your consultation request under regulation 10(6) of the EIA Regulations. West Lindsey District Council, as a consultation body and host authority, wishes to make the following comments in regard to information to be provided with the Environmental Statement.

The following comments are made, following the structure of the EIA Scoping Report by Tillbridge Solar, dated September 2022.

1. Introduction

It is considered that the development is likely to have significant effects on the environment – and welcome the developer's notification under Reg8(1)(b) that an Environmental Statement (ES) will be provided as part of the application (**1.6**).

1.11 Whilst having regard to the proposed transitional arrangements set out in section 1.6 of draft EN-1, we welcome that the emerging NPS will be taken into consideration as part of the EIA.

1.16 - On 8th July 2022 the Central Lincolnshire Local Plan Review was submitted to the Planning Inspectorate. It has now been confirmed that Examination of the Local Plan Review will commence Tuesday 15th November until Friday 9th December, in person (Lincoln), and virtual hearing sessions will take place 13th to 16th December. See <https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan-review-examination/>

2. Site Description and Context

2.2 It states the principal site covers an area of approximately 1,400Ha – what is the precise site area? The ES will need to be specific.

Figure 1-2 Whilst the Environmental Constraints map is welcomed – it is very small scale. Can larger scale maps of the principal site, route corridor area etc also be provided as a supplement to fig. 1-2 within the ES?

3. Description of the Site

Whilst this section indicates that the development will comprise a number of components (**3.1**) – it does not give details as to the number/amount, and locations of equipment. For instance, It does not set out how many on-site substations there will be, or how much battery storage will be required, or where these elements are likely to be located. It is noted that it is not yet known as to whether fixed or tracker solar PV panels will be used, which has a significant bearing on the amount of panels required, and site layout.

The ES should be clear as to what are fixed parameters – and what are still variable. It would be beneficial if these are clearly set out in tabular form.

The ES should use a “Rochdale Envelope” approach and take a cautious “worst case” scenario.

4. Alternatives considered

This section of the ES should set out what alternatives to the proposed site were considered culminating in the site selection, as well as design alternatives.

5. Consultation

Informal wider consultation with the public (**5.12**) is welcomed, ahead of the statutory public consultation period (**5.17 onwards**).

6. Environmental Impact Assessment Methodology

(**6.3**) As per chapter 3, the methodology needs to be clear in applying the “Rochdale Envelope” approach – and being specific as to what parameters the ES assessment is taken on, and what is variable.

It is understood that the lifetime of the development is anticipated at 40 years, but could be longer (**6.21**). The timescales to be employed within the Operational Phase Effects (**6.13**) need to therefore reflect this. Consequently, environmental effects that would last the operational life (and beyond) of the development, such as landscape and visual impacts – would these be categorised as “Reversible Long Term Effects”?

In regard to the “Cumulative Effects with Other Developments” (**6.41 onwards**). Whilst all committed developments need to be considered – WLDC considers that a fundamental part of the ES will be the cumulative effect with other solar project NSIPs that are coming forward, to a similar timescale, within the District. These are the 500MW Gate Burton solar project (684Ha); 600MW Cottam Solar Project (1270Ha); and 480MW West Burton Solar Project (788Ha). Along with the proposed development, cumulatively, the four proposed

solar projects would amount to over 4,150Ha of mainly agricultural land, broadly between Gainsborough and Lincoln, being used for solar PV arrays and battery storage, along with associated infrastructure such as sub stations.

The ES will need to be clear in each chapter, the individual environmental effects, but also the cumulative effects with the other solar projects.

7. Air Quality

It is noted that a qualitative construction phase dust assessment and a quantitative construction phase local air quality assessment are scoped in and will be assessed further in the ES (7.29). It is less clear on the decommissioning phase – this is presumed (in the absence of any statement to the contrary) will generate similar amounts of dust and vehicle movements and should also be within scope.

It is recognised that Due to the nature of the Scheme, no emissions of local air quality pollutants are anticipated from any onsite Infrastructure during operation, and that this will be scoped out.

It is noted that the dust risk assessment will be undertaken on a whole-site basis, as a worst case scenario. In the absence of site specific details such as vehicle routing and the location of construction compounds, we would agree to that.

8. Climate Change

8.7 “The study area for the climate change resilience assessment is the land within the Scheme Boundary” Given the size of the proposed development and the uncertainty over a defined boundary at this stage and consequently the unknown relative proximity to potentially sensitive receptors, the study area should include a resilience assessment on surrounding land.

8.11 Baseline (business as usual) scenario modelling should include likely scenarios with decarbonisation of the grid that will likely happen regardless of this development, so as not to overplay the effect of CO2 reduction from this scheme.

8.12 If the assumption baseline modelling is considering agricultural production in its baseline as business as usual, it should model production scenarios with likely climate change scenarios accounted for.

8.15 “The receptor for climate change resilience is the Scheme itself” Surrounding areas should also be given consideration as per **8.7**.

8.17: Product Lifecycle Assessment: Embodied GHG emissions from energy use in extraction of materials and manufacture of components and equipment and transportation and disposal will form a significant variation according to the type of panels chosen and where they are sourced from etc. The same is true when considering the efficiency of the panels and likely output over their 20 year plus expected lifespan.

Given the aims of the project, it is expected that quite in-depth modelling will be undertaken here with the applicant looking to establish the best practicable environmental option with maximum lifetime CO2 savings benefit. This would include comparative modelling of newer technology that will be commercially available at the point an application is made. 2020 IEMA guidance is mentioned, but other methodologies might

perhaps be used in tandem to verify and collaborate findings. 8.35 mentions Defra 2021 emissions factors (**Ref 8-24**) and embodied carbon data from the University of Bath Inventory of Carbon and Energy (ICE) (**Ref 8-25**). These sources are necessarily generic and do not provide the type lifecycle analysis data of specific panel types and other technology likely to be under consideration

It is the Applicant's stated intention to consider applying a 'Rochdale Envelope' approach (p 25) to maintain flexibility within the design of the Proposed Development, presumably relating to the photovoltaic panel type, the arrangement of supporting infrastructure, and inclusion and arrangement of battery energy storage systems when applying for DCO. Therefore, appropriate worst-case scenario modelling would be considered in each element of the product lifecycle assessment when modelling options. Especially if it is intended to be relied upon as described in **8.36**.

This approach should provide modelling parameters and help guide the proposed development so that it will be sufficiently detailed to include the design, size, capacity, technology and allow a more exacting product lifecycle assessment at that point.

8.21 We consider that temperature changes should be scoped IN.

"While impacts are expected as a result of projected temperature increases, these temperature increases in combination with the Scheme are not expected to have a significant impact upon receptors identified by other environmental disciplines"
No justification is provided for this conclusion. In the absence of additional information, including the location of sensitive receptors, we do not agree this matter should be scoped out at this stage. The ES should assess the potential for temperature changes to exacerbate likely significant effects relating to the Proposed Development, including the deliverability of mitigation measures such as, for example, vegetation screening and implications for achieving BNG.

We consider that sea level rises should be scoped IN.

The developer states " The Scheme is not located in an area that is susceptible to sea level rises" No evidence is provided to support this statement. The Trent is noted to be a tidal river and changes due to sea level rises are projected. The proposed cabling route is in proximity and crosses the river. On the basis of the current information, we would not agree to scope this matter out. The ES should include an assessment of in-combination impacts from sea level rise and resilience of the Proposed Development to sea level rise where significant effects are likely to occur.

Precipitation: The Scoping Report states that significant impacts on surface water or groundwater levels are not expected as a result of precipitation changes in combination with the Proposed Development. It is stated that flow of precipitation to the ground would not be hindered and the report elsewhere mentions a drainage plan.

Solar panels and associated development, across a substantial area (1,400Ha) have potential to significantly alter runoff rates and patterns. This should be scoped IN.

9. Cultural Heritage

The intention of a 3km zone for built heritage assets is largely agreeable (**9.2**). It is agreed that a 5km zone for "high-value assets" should be considered.

However, it should clarify what is considered a "high-value asset". The ability of the development to effect the setting of a heritage asset will depend upon the type of asset and the extent of its setting – not its "value". Consequently the methodology should set out

what designated assets within the 3-5km zone are, and are not included, and the reasoning for such.

9.3 – It is noted that “Assets beyond this distance may also be considered, where identified as necessary by the county archaeologist or other ES chapter authors.” This should include the Local Planning Authority Conservation Officer.

The Local Planning Policy (**9.5 onwards**) should also consider both designated and emerging neighbourhood Plan policies.

9.11 – Baseline conditions. Neighbourhood Plans; Conservation Area appraisals will all have additional (non-designated) heritage assets to assess. There is also the Heritage Lincolnshire’s local list programme.

Table 9.1 – What methodology is to be employed to distinguish Conservation Areas of “demonstrable high value”, from other Conservation Areas?

The Heritage chapter also needs to consider the potential for cumulative harm to heritage assets, from other committed developments. This should include the three other solar project NSIPS proposed within West Lindsey.

10. Ecology

It is considered that the assessment should follow CIEEM guidelines.

10.5 It is noted that the study area has covered international sites up to 30km, and local sites, ancient woodland and notable habitats within 2km. Records of protected and/or notable species of flora and fauna are also within the 2km study area.

This agricultural landscape has a network of hedgerows and ditches, with small geometrical blocks of woodland giving extensive wildlife corridors across the area. The ES should assess the impact upon this important habitat network, and any landscape proposals should aim to improve connectivity of habitat networks. Information should be included from the Greater Lincolnshire Nature Partnership (GLNP), LERC and Lincolnshire Wildlife Trust (LWT).

No Tree preservation Orders (TPO) are present within the site area, though there are TPO protected trees within the buffer zone. Therefore the protected tree legislation of The Town and Country Planning (Tree Preservation)(England) Regulations 2012, and the Town and Country Planning Act 1990 Part 8 Chapter 1, will need to be considered (**10.8**).

10.17 – The Council is encouraged that A BNG assessment will be undertaken (using Defra Metric 3.1 or the most up to date metric) to identify opportunities for contributing to BNG. However, the Scoping Report does not set out whether the development proposes to achieve above or beyond 10% BNG. This needs to be clear, as to how this will be accounted for in the ES.

10.20 - The Council does not presently have in-house expertise to cover ecology matters. This is an area in which we will be seeking additional resource. It is recommended that information is sought from the Greater Lincolnshire Nature Partnership and the Lincolnshire Wildlife Trust.

10.35 – The effect of deer fencing should also be considered during construction and operational phases, and the effect on commuting habits.

As with every chapter, the ES will need to consider the cumulative impact on Ecology, alongside the other three solar project NSIPs.

11. Flood Risk, Drainage and Surface water

It is noted (**11.83**) that “a full Water Environment Impact Assessment is scoped in and will be assessed further in the EIA. This will be supported by a Surface Water Drainage Strategy, a Flood Risk Assessment (FRA) and a Water Framework Directive Assessment (WFDa).

However, we are mindful that the parameters of the site layout and development are yet to be determined (chapter 3). A “worst-case scenario” as per the Rochdale Envelope approach, will need to be employed within the assessment. It would be beneficial for the ES to set out the assumptions and variables within the development.

12. Human Health

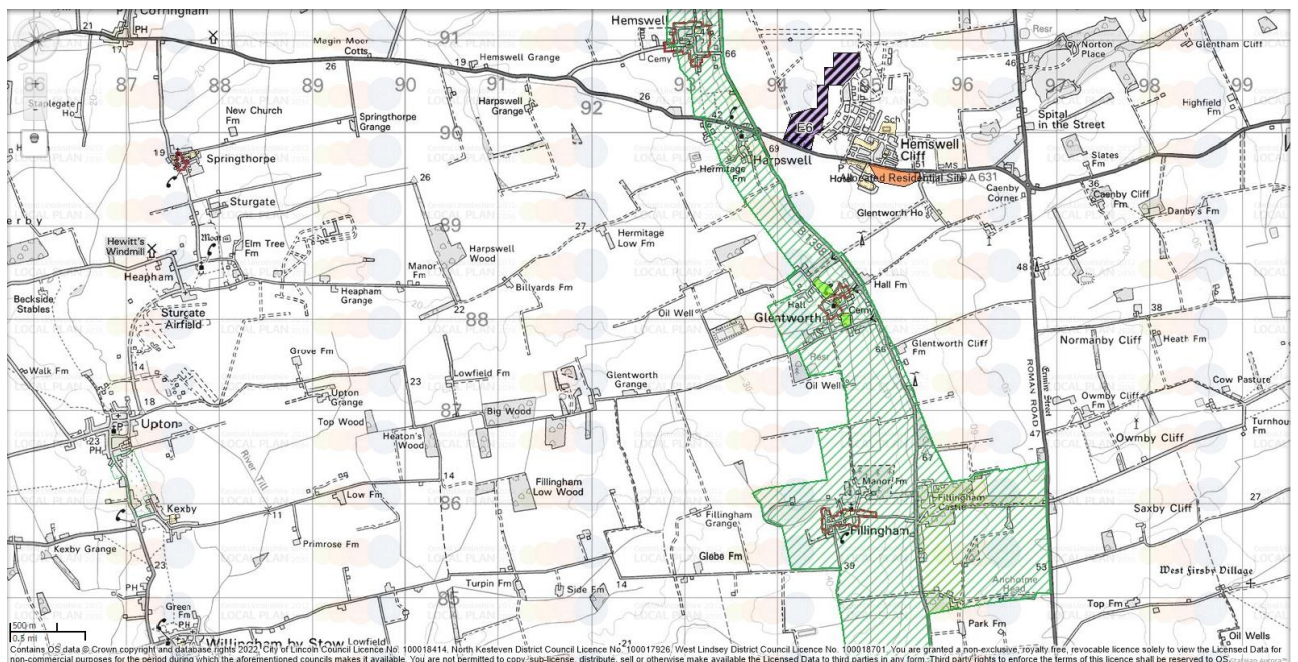
It is noted that this will be scoped into the ES, which we agree with.

This section should consider the cumulative effects with the other 3 solar project NSIPs (and the effects arising from the loss of over 4000Ha of land to this form of development upon the local population).

13. Landscape and Visual Amenity

It is noted that the Landscape and Visual Amenity section will follow GLVIA3, which is welcomed.

13.39 The land to the immediate east is designated as an Area of Great Landscape Value (AGLV) in the Central Lincolnshire Local Plan:



The indicative viewpoints (**fig 13.3**) are noted, and further discussion to agree viewpoints (**13.47**) is welcomed.

Whilst it is noted that a 3km principal site buffer zone is shown – the ZTV clearly expands beyond this – with longer-range views from Middle Street to the east expected.

Furthermore, it is critical that the LVIA addresses the cumulative landscape and visual impacts that will arise with the other 3 solar project NSIPs.

14. Noise and Vibration

Whilst it is not clear whether or not piling is intended, It is noted that an assessment of the noise and vibration effects from construction and decommissioning works is scoped into the ES (**14.33**). We agree to this.

It is also noted that operational noise from fixed plant will also be within scope, to which we also agree.

15. Socio-Economics and Land Use

15.4 The use of a 500m buffer for users of the PRow network requires explanation. The ZTV at figure 13.1 suggests that the development will theoretically be perceptible to users over a greater distance.

15.6 Again, the 500m buffer requires explanation and justification. We are considered that the impacts of the development on matters such as tourism, local businesses, and community are likely to exceed this figure.

15.33 – This section within the ES will need to capture what are the effects of the loss of around 1400Ha of arable land, upon the local population, economy, and West Lindsey as a tourism destination.

The District is traditionally agriculture based, economically and socially. The development, along with the three other solar project NSIPs – would result in the loss of over 4000Ha of predominantly agricultural land to this form of development, for over 40 years. This section needs to be clear therefore as to what the temporary, and permanent effects will be (**15.4**).

16. Transport and Access

West Lindsey District Council is not the Local Highway Authority and will defer to Lincolnshire County Council in this respect.

It is noted that the extent of the study area is still to be determined – but that it will seek to agree with the Highways Authority.

17. Other Environmental Topics

17.5 West Lindsey has a number of restricted airspace designations. Restricted Zone EG R313 places a number of specific restrictions on the airspace which allows the Red Arrows aerobatic team to practice safely and unfettered by other airspace activity. The EIA Scoping should set out whether any designated airspace / safeguarding zones apply to the

Site and surrounds, and whether this is likely to have any significant environmental effects, including glint and glare. It is considered that the potential effect upon airspace and RAF Scampton may also be relevant to chapter 15 (socio-economics...).

17.7 – It is noted that *“As appropriate, the results and recommendations of any glint and glare calculations will be incorporated into the Scheme design and a glint and glare assessment presented as a technical appendix to the ES. It is therefore proposed to be scoped out of the assessment.”* It is considered that the Glint & Glare Assessment should determine as to whether or not there are likely to be significant environmental effects. In its absence, glint & glare should remain in scope.

17.24 – Whilst it is noted that major accidents or disasters are proposed to be scoped out – we are yet to know where the battery storage will be, or the scale of it (chapter 3). It is considered that the risk of battery fire/explosion should be addressed in the ES, including any measures designed to minimise impacts on the environment in the event such an occurrence.

18. Proposed Scope of The EIA

Whilst **table 18.1** is noted, it would be helpful to have a clear table showing precisely what is proposed to be scoped out.

19. Proposed Structure of the Environmental Statement

It is noted that “Cumulative Effects” are proposed to be considered as a separate chapter. The development would, considered cumulatively with Island Green Power’s Cottam & west Burton Solar Projects, and Low Carbon’s Gate Burton Project – result in a potential cumulative impact of over 4000 hectares of land between Gainsborough and Lincoln, given over to solar and battery storage projects.

It is considered therefore that each and every topic within the ES, must explicitly address the cumulative effects with other developments, including the other four nationally significant solar projects proposed within the District. This should be set out on a chapter by chapter basis.

Please consider the above to constitute West Lindsey District Council’s formal consultation response under reg10(6) of the EIA Regulations.

Yours faithfully,

**Russell Clarkson BA(Hons) Dip TP MRTPI
On behalf of West Lindsey District Council**

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From: [Clerk Willinghampc](#)
To: [Tillbridge Solar Project](#)
Subject: Responses to the Planning Inspectorate regarding the Scoping Report
Date: 06 October 2022 21:12:27

WILLINGHAM BY STOW PARISH COUNCIL

This is the Response from Willingham by Stow Parish Council:

Willingham by Stow Parish Council strongly oppose the massive scale of the 4 Solar Energy Projects that have been earmarked for the area. The parish council support plans for renewable energy generation but consider these 4 projects unacceptable.


The large area of land required for these would mean a huge loss and waste of agricultural land to development, consequently impacting food production in the local area. 10 thousand acres of agricultural land would be compromised, equivalent to 3x the size of the town Gainsborough. With solar panels surrounding all local villages. Would this land really be suitable for farming again once all solar panels and concrete have been removed? Many people are concerned about the implications such major schemes will have on the area; considering the visual impact, negative affect on wildlife and archaeology, loss of countryside and associated agricultural jobs. In addition, the loss of footpaths and byways during construction, as well as bearing in mind that local roads are unsuitable for construction traffic on this scale.

It would dramatically change our local rural scene for the worse. The attractive link between the village and the countryside would be destroyed.

The ground underneath the solar panels will not be able to absorb water, hence there will be additional run off. Where will this water go? The area has history of flooding.

Regards Lisa

Lisa Brooks-Sleight (clerk)
Willingham by Stow Parish Council

13 The Close, Sturton by Stow, Lincoln, LN1 2AG


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From: [REDACTED]
To: [Tillbridge Solar Project](#)
Subject: EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation
Date: 24 October 2022 13:57:42

UD-6152-2022-PLN

Dear Sir/Madam

EN010142 - Tillbridge Solar - EIA Scoping Report Notification and Consultation

Thank you for the opportunity to comment on the above Scoping Report. The site is partly within the Upper Witham Internal Drainage Board district. A number of Board maintained watercourses are potentially affected by the proposals and the cable route.

Please send and further correspondence to;- planning@witham3idb.gov.uk

It is noted a Flood Risk Assessment will be produced as part of the submission which will be produced with consultation with the Board (11).

There are several Board maintained watercourses that will be affected by the proposals. Under the terms of the Board's Byelaws, the prior written consent of the Board is required for any proposed temporary or permanent works or structures in, under, over or within the byelaw distance of 9m of the top of the bank of a Board maintained watercourse. A clear unobstructed strip the full width is required adjacent to all the maintained watercourses as identified in 11.114..

Within the Board's district for ordinary watercourses under the terms of the Land Drainage Act. 1991 the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse including infilling or a diversion. It is recommended that a access of appropriate width is left adjacent to all watercourse to allow for mechanical maintenance.

Within Lincolnshire under the provisions of the Flood and Water Management Act 2010, and the Land Drainage Act. 1991, the prior written consent of the Lead Local Flood Authority (Lincolnshire County Council) is required for any proposed works or structures in any watercourse outside those designated main rivers and Internal Drainage Districts. Within the catchment draining to the Board's area (extended area) this Board acts as Agents for the Lead Local Flood Authority and as such any works, permanent or temporary, in any ditch, dyke or other such watercourse will require consent from the Board.

Regards

Guy Hird
Head of Technical & Engineering Services

We have Engineering vacancies: <https://witham3idb.gov.uk/notices-ads/>

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Witham First District Internal Drainage Board
Witham Third District Internal Drainage Board
Upper Witham Internal Drainage Board
North East Lindsey Drainage Board

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Four independent statutory Land Drainage and Flood Risk Management Authorities working in partnership.

www.witham3idb.gov.uk