



Application by Tillbridge Solar Limited for Tillbridge Solar Project
The Examining Authority's first written questions and requests for information (ExQ1)
Issued on 19 November 2024

The following Table sets out the Examining Authority's (ExA's) written questions and requests for information - ExQ1. The Examination timetable enables the ExA to issue a further round of written questions in due course. The further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework, which is primarily derived from the Initial Assessment of Principal Issues provided as Annexe C to the Rule 6 letter of 17 September 2024. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

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

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue number and a question number. For example, the first question on air quality and emissions issues is identified as Q1.1.1. When you are answering a question, please start your answer by **quoting** the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a Table based on this one to set out your responses. An editable version of this Table in Microsoft Word is available on request from the case team: please contact tillbridgesolarproject@planninginspectorate.gov.uk and include **Tillbridge Solar Project** in the subject line of your email.

Responses are due by Deadline 3: Tuesday 10 December 2024



Abbreviations used:

AN	Advice Note	ExA	Examining Authority
ALC	Agricultural Land Classification	FCEMP	Framework Construction Environmental Management Plan
ATC	Automatic Traffic Count Survey	FDEMP	Framework Decommissioning Environmental Management Plan
BDC	Bassetlaw District Council	FLEMP	Framework Landscape and Ecological Management Plan
BESS	Battery Energy Storage System	FOEMP	Framework Operational Environmental Management Plan
BMV	Best and Most Versatile land	GVA	Gross Value Added
BNG	Biodiversity Net Gain	ha	Hectare
BoR	Book of Reference	HDD	Horizontal Directional Drilling
CA	Compulsory Acquisition	HGV	Heavy Goods Vehicle
CCGT	Combined Cycle Gas Turbines	HE	Historic England
CEMP	Construction Environmental Management Plan	HRA	Habitats Regulation Assessment
DCO	Development Consent Order	IDB	Internal Drainage Board
dDCO	Draft Development Consent Order	IPs	Interested Parties
EIA	Environmental Impact Assessment	ISH	Issue Specific Hearing
EM	Explanatory Memorandum	km	Kilometre
ES	Environmental Statement	LCC	Lincolnshire County Council



LEMP	<i>Landscape and Ecological Management Plan</i>	PoC	<i>Point of Connection</i>
LIR	<i>Local Impact Report</i>	PRA	<i>Preliminary Risk Assessment</i>
LLFA	<i>Lead Local Flood Authority</i>	PRoW	<i>Public Right of Way</i>
LPA	<i>Local Planning Authority</i>	PV	<i>Photovoltaic</i>
LSE	<i>Likely Significant Effects</i>	SoR	<i>Statement of Reasons</i>
LVIA	<i>Landscape and Visual Impact Assessment</i>	SAC	<i>Special Area of Conservation</i>
MW	<i>Megawatt</i>	SoS	<i>Secretary of State</i>
RR	<i>Relevant Representation</i>	SuDS	<i>Sustainable Drainage Systems</i>
RVAA	<i>Residential Visual Amenity Assessment</i>	WLDC	<i>West Lindsey District Council</i>
NE	<i>Natural England</i>	WR	<i>Written Representation</i>
NCC	<i>Nottinghamshire County Council</i>	ZTV	<i>Zone of Theoretical Visibility</i>
NMU	<i>Non-Motorised User</i>		
NPS	<i>National Policy Statement</i>		
NRMM	<i>Non-Road Mobile Machinery</i>		
NSIP	<i>Nationally Significant Infrastructure Project</i>		
ONS	<i>Office of National Statistics</i>		



The Examination Library

References in these questions set out in square brackets (eg [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link:

[Examination Library](#). It will be updated as the Examination progresses.

Citation of Questions

Questions in this Table should be cited as follows:

Question reference: issue reference: question number, eg ExQ2 1.0.1 – refers to question 1 in this Table.



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ExQ1	Question to:	Question:
<p>1. General and cross-topic questions</p>		
<p>General and cross-topic questions</p>		
<p>Q1. 1.1</p>	<p>Applicant</p>	<p>Framework Management Plans</p> <p>Can the Applicant please update all Framework Management Plans to the extent that they are based on the same wording as those submitted (and in two cases, consented) for other Solar NSIPs in the local area.</p> <p>To cite one example, The Construction Environmental Management Plan (CEMP) in respect of the Cottam Solar Project was revised several times. Revision B includes wording relating to HDD and subsurface drainage. Revision C includes wording relating to a substation fire action plan. Revision D includes wording relating to impacts from EMF. None of this revised wording is included in the Tillbridge Framework CEMP (FCEMP) [REP1-055].</p> <p>It is accepted that these are different projects but the wording of the Tillbridge Solar Project management plans is often identical to that used in the equivalent documents for other projects. It makes sense to update all management plans to reflect the most up-to-date consented versions on other projects (Cottam and West Burton). Particularly given that revisions to these documents presumably arose as a result of consultation and representations from Local Authorities, other Statutory Consultees and Interested Parties.</p> <p>Taking this approach will avoid unnecessarily going over the same issues which have been addressed previously. Particularly where they relate to shared aspects of the cable route. Where changes are not made, can an explanation please be provided.</p>
<p>Q1. 1.2</p>	<p>Applicant</p>	<p>Commonality with other NSIPs</p> <p>Could the Applicant please identify exactly which parts of the cable route, Cottam substation development and any other development are identical to that for which consent has already been obtained in respect of other schemes. In addition, where statutory and interested parties have raised issues with regard to those common elements of the Proposed Development, could the Applicant please set out (in tabulated form) whether those concerns/ effects have already been considered and addressed by the Secretary of State (SoS) or previous ExAs in relation to other schemes.</p>

ExQ1	Question to:	Question:
Q1.1.3	Applicant	<p>Shared cable route</p> <p>Grid Connection Statement [APP-214] Paragraph 2.1.4 defines the 'shared cable route corridor' as “<i>an area within which the Applicant, the Gate Burton undertaker, and the Cottam undertaker will all locate their connections to the National Grid Cottam Substation; and, in part, the West Burton undertaker will locate its connection to the National Grid West Burton Substation</i>”.</p> <p>Taking this into account, why does the Cottam cable route appear to deviate from that of the Proposed Development as shown on Environmental Statement (ES) Figure 4-6 [APP-149]? Is the Cottam route (shaded blue) on Figure 4-6 reflective of the development approved under the recent Development Consent Order (DCO)?</p>
Q1.1.4	Applicant	<p>Central Lincolnshire Local Plan (2023) Policies</p> <p>Table 4-1 of West Lyndsey District Council's (WLDC) Local Impact Report (LIR) [REP1A-005] identifies the following Central Lincolnshire Local Plan (2023) policies which do not appear to have been included in Appendix B of the Applicant's Planning Statement [AS-029]: S2, S17, S20, S28, S29, S31, S43 and S66. Could the Applicant please provide a response on the relevance and implications of these policies?</p>
Q1.1.5	WLDC and Applicant	<p>ES v LIR assessment</p> <p>Could WLDC please provide a Table setting out how the conclusions contained within its LIR [REP1A-005] - with regard to the environmental effects of the Proposed Development - differ from those reached in the Applicant's ES? This should also be included in the SoCG [REP1-042]. The Applicant is invited to undertake the same exercise and may wish to liaise with WLDC in this regard.</p>
Q1.1.6	WLDC and Applicant	<p>Cumulative construction period</p> <p>The WLDC LIR [REP1A-005] refers to a 'decade' long construction period (see for example paragraph 8.14). Could WLDC please explain how it has concluded that cumulative construction could take up to a decade, with specific reference to the Applicant's assertions to the contrary? Could the Applicant please provide a response as to whether a 10-year cumulative construction period is a realistic worse-case scenario?</p>
Q1.1.7	Applicant and LCC	<p>Neighbourhood Plans</p> <p>Lincolnshire County Council's (LCC) LIR [REP1A-001] indicates that the following neighbourhood plan policies are relevant:</p> <ul style="list-style-type: none"> • '(Sturton by Stow, and Stow) Policy 5: Delivering Good Design'.

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ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> • '(Hemswell Cliff) Policy 2: Delivering Good Design'. <p>Could LCC please elaborate on which Neighbourhood Plans these policies are contained within and provide copies of these policies?</p> <p>Could the Applicant respond on the relevance and implications of these policies? These policies do not appear to be referred to in the Applicant's Planning Statement [AS-029]?</p>
Q1. 1.8	Applicant	<p>LCC policies</p> <p>Can the Applicant please update Appendix B of the Planning Statement [AS-029] to address the policies referred to at paragraphs 5.14, 5.16 and 5.17 of LCCs LIR [REP1A-001], or alternatively (if not considered relevant) explain why they are not relevant?</p>
Q1. 1.9	LCC	<p>Planning balance</p> <p>The Examining Authority (ExA) notes LCCs conclusions contained in its WR [REP2-012]. However, could LCC please outline how it considers these conclusions and the alleged 'impacts' should be balanced in light of National Policy Statement (NPS) EN-1 Paragraph 4.1.7?</p>
Q1. 1.10	WLDC	<p>Planning balance</p> <p>The Examining Authority (ExA) notes WLDCs conclusions with regard to the planning balance at Section 8 of its Written Representation [REP2-016]. However, could WLDC please outline how it considers these conclusions and the alleged 'impacts' should be balanced in light of National Policy Statement (NPS) EN-1 Paragraph 4.1.7?</p>
Q1. 1.11	All parties	<p>Good design</p> <p>All parties should be aware that Nationally Significant Infrastructure Projects: Advice on Good Design was published on 23 October 2024. All parties (in particular the Applicant and Local Authorities) are invited to submit representations on the implications of the advice note. In addition, could the Applicant please explain whether, and if so how, the Application complies with this advice?</p>
Q1. 1.12	NCC	<p>Policies</p> <p>Could Nottinghamshire County Council (NCC) please provide a copy of policies (including the title page of the relevant development plan document) referred to in its LIR [REP1A-002]?</p>

ExQ1	Question to:	Question:
Q1. 1.13	Applicant	<p>FCEMP</p> <p>The Framework Construction Environmental Management Plan (FCEMP) [REP1-055] commits to the preparation of further monitoring plans but does not explain what these would contain. Please confirm the list of additional plans and monitoring that the Applicant will include within its FCEMP and an outline of what they may contain.</p>
Q1. 1.14	Applicant	<p>Shared Management Plans</p> <p>The Report on the Interrelationships with Other NSIPs [APP-215], at paragraphs 5.41 to 5.44, refers to a joint Construction Traffic Management Plan (CTMP). Can the Applicant provide an update on commitments to shared mitigation strategies such as the Joint Construction Traffic Management Plan? The 'Report on the Interrelationships with Other NSIPs' indicates that no commitment is made to produce one as a result of the lack of certainty that the other projects will be consented. Now that DCOs have been made for Cottam and Gate Burton could the Applicant provide an update position?</p>
Q1. 1.15	Applicant	<p>ES Update</p> <p>Appendix A of the Applicant's Response to Relevant Representations [REP1-028] appears to comprise an update of the existing cumulative effects assessment in the ES. As such, could the Applicant either supplement or update ES Chapters 18 and 17?</p>
Generating Capacity		
Q1. 1.16	Applicant	<p>Import</p> <p>The ExA notes that the Applicant has provided a screenshot of the bilateral connection agreement with the National Electricity System Operator at Appendix A of its Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046]. However, does this apply to import as well as export?</p>
Q1. 1.17	Applicant	<p>Future changes</p> <p>Is it possible that the bilateral connection agreement could be altered in the future? Over what period does it take effect? Can the Applicant please provide a copy of the agreement?</p>
Q1. 1.18	Applicant	<p>Overplanting</p> <p>Paragraph 5.2.1 at Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046] outlines that the Proposed Development would be overplanted at a ratio of 1.57 (157%). Could the Applicant please provide evidence to demonstrate what ratios typically</p>

ExQ1	Question to:	Question:
		<p>apply to other schemes (either consented or in the process of being consented – for example Gate Burton, West Burton and Cottam) and justify any difference in the ratio of overplanting proposed? Please note footnote 92 of NPS EN-3 requires a justification to be provided for overplanting.</p>
Q1. 1.19	Applicant	<p>Overplanting Could the Applicant please confirm whether panel replacement has been factored in when considering the degree of overplanting required/ deemed necessary? If so, please confirm the assumed rate of Panel replacement over the lifetime of the project?</p>
Q1. 1.20	Applicant	<p>Overplanting Paragraph 8.2.12 at Appendix B of the Written Summary of Applicant’s Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046], states in full: <i>“The Mallard Pass Solar Farm [EN010127] has an overplanting ratio with a range of 1.3 to 1.5 times multiplied by the grid connection agreement. In his decision letter, the Secretary of State concluded that the overplanting ratio was justified and reasonable. This decision is important and relevant given that this Scheme falls within a similar range.”</i> Please could the Applicant direct the ExA to the evidence contained within the SoS Decision Letter and ExA Recommendation Report to support this? Please also confirm what proportion of land would be overplanted for the Mallard Pass Scheme, with specific reference to the ExA Recommendation Report.</p>
Q1. 1.21	Applicant	<p>Lifetime Generation Please provide an assessment of a typical annual output from the development proposal to the grid, how this relates to the grid connection capacity and its utilisation ratio, how this ratio changes day to night, seasonally and over the life of the development taking into account panel degradation and climate change.</p>
<p>Associated Development – Battery Energy Storage Systems (BESS)</p>		
Q1. 1.22	Applicant	<p>BESS – ‘possible services’ Section 7.2 at Appendix B of Written Summary of the Applicant’s Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046] briefly outlines the ‘possible services and contractual arrangements’ for the BESS. Could the Applicant please confirm the following:</p> <ul style="list-style-type: none"> a) During times when the BESS is providing these services and those referred to in paragraphs 6.11.22 to 6.11.25 of the Statement of Need [APP-210], would the BESS be functionally separate to the co-located solar (i.e. is it the case that the BESS could not provide these services at exactly the same time as importing and exporting electricity generated from the co-located solar)?

ExQ1	Question to:	Question:
		<p>b) Is it more profitable to provide the services mentioned above or to solely export electricity produced by the co-located solar? Can the Applicant please provide evidence to demonstrate typical unit prices (£/MW) for electricity exported from the co-located solar and unit prices for provision of other services not related to co-located solar?</p> <p>c) If it is more profitable to provide contracted or other services, then is it plausible that the undertaker would seek to maximise the proportion of time which the BESS provides these contracted or other services?</p> <p>d) Are there any other ways, not already described in the application documents, which the BESS could be utilised independently of the co-located solar, for example wholesale market participation, balancing mechanism, capacity market, ancillary services?</p> <p>e) Can the Applicant please provide examples of Ancillary (Balancing) Service contracts, Reserve Service Contracts and Response Contracts?</p> <p>f) In addition, could the Applicant please confirm whether any of these contracts would require the BESS to remain effectively dormant, for example through firm service contracts?</p> <p>g) Could the Applicant also please explain what periods such contracts typically require such services to be provided over?</p>
Q1. 1.23	Applicant	<p>BESS – ‘possible services’ Paragraph 8.3.9 at Appendix B of the Written Summary of the Applicant’s Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046] outlines in part: <i>“Using the current indicative Scheme design, it is estimated that the BESS will be charged by the solar PV array on approximately 30% of the days in a year.”</i> If that is the case, then what function is the BESS fulfilling for the majority of the year (70%)?</p>
Operational lifetime		
Q1. 1.24	Applicant	<p>Maintenance Section 4.3 of the Written Summary of the Applicant’s Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046] states in part: <i>“Wholesale replacement of all Scheme components is not authorised under Article 5(1), with assumptions around HGV traffic in the Framework OEMP and Chapter 16: Transport and Access of the ES [APP-047] reflecting this approach.”</i></p>

ExQ1	Question to:	Question:
		<p>Could the Applicant confirm whether the indicative design life of “scheme components” (as set out in Table 2-2 of the Framework Operational Environmental Management Plan (FOEMP) [REP1-019]) has directed assumptions which have been assessed under every ES topic?</p>
Q1. 1.25	Applicant	<p>Maintenance</p> <p>Section 4.3 of the Written Summary of the Applicant’s Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046] indicates that the FOEMP [REP1-019] would control maintenance operations and in particular; replacement panels and batteries. It states in part:</p> <p><i>“Paragraph 2.3.10 [of the Framework OEMP] provides the minimum information that must be included as a matter of course, while paragraph 2.3.11 requires the Applicant to provide further notification to the relevant local planning authorities in respect of any maintenance undertaken as a result of unforeseen emergencies.”</i></p> <p>These appear to be incorrect paragraph references. Nonetheless, could the Applicant please explain where in the DCO or the FOEMP it stipulates that specific details ‘must’ be submitted for approval in writing prior to that maintenance work being undertaken (i.e. where is the control to prevent the undertaker from omitting details of Panel replacement or battery replacement from the annual maintenance plan)?</p>
Q1. 1.26	Applicant	<p>Maintenance</p> <p>Paragraph 2.3.2 of the FOEMP [REP1-019] refers to <i>“unforeseen emergencies that require maintenance throughout the year”</i>. However, there is no definition of ‘unforeseen emergencies’. Neither is there any definition of activities excluded from ‘unforeseen emergencies’. Could the Applicant please ensure that this is adequately defined such that maintenance activities (including Panel replacement) could not be categorised as an ‘unforeseen emergency’?</p>
Decommissioning		
Q1. 1.27	Applicant	<p>Assumptions</p> <p>Appendix C of the Written Summary of the Applicant’s Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046] sets out a <i>“Review of Worst-Case Decommissioning Assumptions and Assessment Conclusions”</i>. Could the Applicant explain why the removal of the substations is considered to be a worst-case scenario in respect of heritage and landscape character (the latter as opposed to visual effects). In relation to heritage, Appendix C of the Applicant’s Planning Statement [AS-029] identifies</p>

ExQ1	Question to:	Question:
		various heritage assets which would be subject to 'less than substantial harm'. What effect would the removal of the substations have on this level of harm?
Need		
Q1.128	Applicant	<p>Need</p> <p>Many representations from Interested Parties have challenged the 'need' for the Proposed Development and refer to other technologies or roof-mounted solar development. Notwithstanding the information contained in the Applicant's existing application documents, could it please succinctly set out a response with specific reference to the key policy and legislative differences between the current project and the Cottam, West Burton and Gate Burton NSIPs?</p>
Site selection and alternatives		
Q1.129	Applicant	<p>Alternatives</p> <p>Could the Applicant please succinctly set out what it considers to be the policy and legislative requirements in respect of considering alternative sites?</p>
2. Biodiversity and ecology		
Q1.21	Applicant	<p>Species Impacts: Brown Hare (<i>Lepus europaeus</i>)</p> <p>This species has been observed and recorded at the site. What is the likely impact of the scheme on this species and what mitigation is in place to minimise this? Ref: 6.1 Chapter 9 Ecology and Nature Conservation [APP-040].</p>
Q1.22	Applicant Environment Agency	<p>Species Impact: Water Vole (<i>Arvicola amphibius</i>)</p> <p>The Environment Agency has requested a riparian survey of the watercourses of the cable corridor impacted by the scheme. Whilst one has been provided for the principal site, has this been undertaken on the cable route corridor and could the details of this be supplied? Ref: 6.2 Appendix 9-10 Baseline Report for Riparian Mammals [APP-091].</p>
Q1.23	Applicant Natural England	<p>Species Impact: Skylark (<i>Alda arvensis</i>)</p> <p>What is the impact on the skylark population of the loss of arable cropland versus the BNG provision and under sowing of the solar panels?</p>

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ExQ1	Question to:	Question:
		<p>During construction the site is likely to be subject to surface significant traffic and disruption. How will this transient impact relate to the displacement of the resident skylark population and its potential for their return to the site following construction?</p> <p>Ref: 6.2 Appendix 9-8 Baseline Report for Non-Breeding Birds [APP-089].</p>
Q1.24	Applicant Environment Agency Natural England	<p>Species Impact: Aquatic Invertebrates There is evidence of disruption to the aquatic invertebrate population by the presence of solar panels and also consequently the native bat population who rely on those invertebrates for food source and also mistake solar panels for large bodies of water. What is the likely impact on both of these populations from this scheme?</p> <p>Ref: BSG Ecology Report on Solar Farms impacts on wildlife</p>
Q1.25	Applicant Natural England	<p>Species Impact: Curlew (<i>Scolopax arquata</i>) What is the significance of the breeding curlew pair noted within the Order Limits and what is the potential impact the proposal may have for the continued return to the site of the species?</p> <p>Ref: 6.2 Appendix 9-7 Breeding Birds Part 1 of 2 [APP-088].</p>
Q1.26	Applicant Natural England	<p>Species Impact: Great Crested Newt (<i>Triturus cristatus</i>) What is the significance of the development on the Great Crested Newt population within the Order Limits?</p> <p>6.2 Appendix 9-5 Baseline Report for Great Crested Newt [APP-085]</p>
Q1.27	Applicant Environment Agency Natural England	<p>Species Impact: Migratory fish including Lamprey on the River Trent The burial depth of the cable below the river bed assesses there is only risk to migratory aquatic species in the lower water column near the bottom of the river. The Applicant advises that the migratory species can use the full depth of the water column but will they be able to sense this risk and adjust accordingly or should they have to?</p> <p>Ref: 6.1 Chapter 17 Other Environmental Topics [APP-048].</p>
Q1.28	Natural England	<p>Species Impact: Ground nesting birds What is Natural England's view on the likely impact on the scheme and whether it results in a net displacement of bird population or encourages ground nesting due to lack of predators?</p> <p>Ref: 6.2 Appendix 9-8 Baseline Report for Non-Breeding Birds [APP-089]</p>

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ExQ1	Question to:	Question:
Q1.29	Applicant Natural England	<p>Species Impact: Bats Is there any evidence to establish the impact on commuting and foraging bats of the presence of large areas of solar panels? Ref: 6.2 Appendix 9-9 Baseline Report for Bats [APP-090].</p>
Q1.2.10	Applicant Natural England	<p>Biodiversity Net Gain: The results of the assessment indicate that the current illustrative design for the Scheme is predicted to result in a net gain of 64.55% for area-based habitat units, 17.33% for hedgerow units, and 22.94% for watercourse units. How does this provision of biodiversity net gain align to the biodiversity impacts lost and specifically to those species relying on the existing biodiversity provision.</p> <p>The scheme alludes to providing over 1,000 hectares of new grassland creation. This is presumed to be principally the land area under the proposed solar panels. How will this biodiversity provision compare the biodiversity lost from the existing situation i.e. arable fields; and how will this grassland compare to grassland unencumbered by the overshadowing of solar panels.</p> <p>What are the mechanisms within the DCO for securing BNG creation and ensuring its ongoing maintenance as required. Ref: 7.14 BNG Report [APP-226].</p>
Q1.2.11	Applicant	ES Chapter 9 [APP-040] and ES Chapter 10 [APP-041] identify the presence of European Eel <i>Anguilla anguilla</i> within the River Till. ES Chapter 10 also identifies that there could be up to four cable route crossings of this watercourse by open cut trench methods. Can the Applicant confirm how this has been taken into account in the assessment of effects on this receptor?
Q1.2.12	Applicant	Can the Applicant confirm when the datasets identified in ES Chapter 9, Table 9-1 [APP-040] were collected? What habitat data have solely come from other projects for the cable route corridor and what areas have been 'ground truthed' by the Applicant?
Q1.2.13	Applicant	Can the Applicant provide details of the target notes identified as points on the Phase 1 habitat maps supplied as Appendix B to the Scoping Report [APP-051]. Where these target notes remain relevant,

ExQ1	Question to:	Question:
		<p>please provide an updated copy of the phase 1 habitat maps depicted in ES Figure 9-3 [APP-166] which do not identify any target notes.</p> <p>Also please provide a plan demonstrating how the risks of a bentonite breakout during directional drilling would be managed and controlled.</p>
Habitats Regulations Assessment (HRA)		
Q1.2.14	Natural England	<p>HRA</p> <p>Does Natural England (NE) have any representations in relation to the Applicant’s responses to Natural England’s Relevant Representation [RR-208] provided in the document titled ‘Applicant’s Responses to Relevant Representations’ (PDF pages 10-28) [REP1-028]? Could NE also please provide a response on updated ES Appendix 9-12: Habitats Regulations Assessment Report [REP1-058] and in particular the conclusions in relation to:</p> <ul style="list-style-type: none"> a) the distances used to screen in European sites to the assessment; b) the rationale for screening out the Golden Plover qualifying feature of the Humber Estuary Ramsar site; c) conclusions in relation to no Likely Significant Effects (LSE) from water quality to the Humber Estuary Ramsar site and Humber Estuary Special Area of Conservation (SAC); and d) the conclusions in respect of in-combination effects with the One Earth Solar and Great North Road solar projects.
Q1.2.15	Natural England, WLDC, NCC, BDC and LCC.	<p>HRA</p> <p>In its response to Relevant Representations [REP1-028], the Applicant provides further explanation on the reasons for the selection of a minimum 5m depth for the crossing of the River Trent. Are you satisfied with the Applicant’s explanation? If not, what do you consider the Applicant needs to do to resolve these matters?</p>
Q1.2.16	Applicant	<p>HRA</p> <ul style="list-style-type: none"> a) The ExA notes that no Figure is supplied to show the Proposed Development in relation to the identified European sites. Table 7 of the Applicant’s updated HRA [REP1-058] also appears to omit the additional impact pathways that are considered in response to NE’s comments [RR-208] on Golden Plover. Please provide an updated HRA that addresses these omissions.

ExQ1	Question to:	Question:
		<p>b) Paragraph 4.2.2 of the Applicant’s updated HRA has amended the distances used to screen potential sites into the assessment. Please confirm your reasons for these changes?</p> <p>In its relevant representation [RR-208], NE asked for clarification on the rationale for the use of a minimum 5m burial depth beneath the River Trent. Your response [REP1-028] states that the reasons for the depths of the crossings are set out in [AS-058] (Outlined Design Principles Document). This document states that trenchless crossings would be installed at 3m depth ‘... with the exception of the River Till and the River Trent where cables will be installed at a minimum of 5m below the lowest surveyed point of the riverbed <u>to prevent disturbance to fish species</u>’ (ExA emphasis added). Can the Applicant: (with reference to <i>People over Wind and Sweetman v Coillte Teoranta</i>):</p> <p>c) confirm if the proposed 5m depth below the riverbed has been applied as mitigation for effects specifically on qualifying features of the Humber Estuary SAC both alone and in-combination with other plans and projects; and</p> <p>d) if that is so, provide an updated assessment of LSE during operation from disturbance to the Humber Estuary SAC River lamprey and Sea lamprey qualifying features.</p> <p>The ExA notes the explanation provided in ES Chapter 17 [APP-048] on the detectability of EMF including a reference to guidance from National Grid in this regard. It also notes the feedback on this matter in the Environment Agency’s RR ([RR- 093]. Does this evidence also have relevance to the conclusions of the potential for LSE on the River Lamprey and Sea lamprey features of the Humber Estuary Ramsar site?</p>
<p>3. Climate change</p>		
Q1.3.1	Applicant	<p>Data</p> <p>Is the data used to establish embodied carbon for various scheme components up to date? For example, ES Chapter 7 [APP-038] cites “<i>Ref 7-15 EPD International AB (2020). Environmental Performance Declaration (EPD) for Jolywood N-type Bifacial Double Glass Photovoltaic Modules</i>” and “<i>Ref 7-16 ICE, 2019. Embodied Carbon - The ICE Database, s.l.: s.n</i>”.</p>
Q1.3.2	Applicant	<p>Replacement</p> <p>ES Paragraph 7.3.24 [APP-038] states that it has been assumed that panels will be replaced just once over the lifetime of the development. Is this a worse-case scenario? Please provide evidence to support this assertion.</p>

ExQ1	Question to:	Question:
Q1.3.3	Applicant	<p>Transport of components</p> <p>ES paragraph 7.3.12(b) [APP-038] states in full: <i>“Items procured from Europe are assumed to have a road transport distance of 1,770 km (based on half of the reasonable maximum distance equipment might be transported within Europe, plus the distance between Dover and the Scheme).”</i></p> <p>Why has ‘half the reasonable maximum’ been chosen? Is this a worst-case scenario? What is a ‘reasonable maximum’ and how has it been calculated?</p>
Q1.3.4	Applicant	<p>Diesel</p> <p>ES paragraph 7.3.18 [APP-038] states in part: <i>“Emissions from use of plant and machinery during construction have been calculated based on an assumption of a total of 602,555 litres of diesel used throughout the construction project. This is based on the usage of similar solar projects”.</i></p> <p>Which similar projects are being referred to and can the Applicant provide evidence?</p>
Q1.3.5	Applicant	<p>Water</p> <p>ES paragraph 7.3.19 [APP-038] states in full: <i>“Consumption of water is estimated at 12 litres/day/person for staff. A further usage of 3m³ /MWp of panels is also required. Emission factors for water supply are taken from the 2023 conversion factors for company reporting published by the UK Government (Ref 7-20). As a conservative estimate, it is assumed that all water supplied is removed for treatment via the wastewater network.”</i></p> <p>Does this include water used to clean the panels? What wastewater network is being referred to?</p>
Q1.3.6	Applicant	<p>Baseline</p> <p>ES paragraph 7.3.26 [APP-038] states: <i>“A without-project baseline for the Scheme assumes that lifetime electricity output would otherwise be generated by Combined Cycle Gas Turbines (CCGT), which have a typical operational carbon intensity of 0.354 kgCO₂e/kWh. It is assumed the energy expected to be generated by the Scheme over its lifetime (52.1 TWh) would instead be required to be supplied by CCGT in this baseline without-project scenario.”</i></p>

ExQ1	Question to:	Question:
		Why has this assumption been made as opposed to a baseline where lifetime electricity output is generated by an offshore windfarm for example?
Q1.3.7	Applicant	<p>Replacements</p> <p>The rate of replacement outlined in ES paragraph 7.3.24 [APP-038] assumes a midpoint for the ranges provided. For example, BESS cells are said to have a life cycle of 5-15 years but a midpoint of 10 years has been used. How does using midpoints represent a worst-case scenario and what evidence is there that these midpoints are more likely than the lower end of the ranges provided.</p>
Q1.3.8	Applicant	<p>BESS</p> <p>ES Paragraphs 7.8.27 to 7.8.30 [APP-038] address the carbon savings resulting from the use of the BESS. Paragraph 7.8.30 states in part: “...<i>these additional savings from the use of the BESS are not considered in the overall GHG assessment below</i>”. Could the Applicant please confirm whether this statement applies to the BESS in all of its functions (including storage of electricity from the co-located solar) or just the additional ‘independent’ services?</p>
Q1.3.9	Applicant	<p>Baseline</p> <p>Paragraph 7.8.37 states:</p> <p><i>“The Scheme has very low emissions relative to the sectoral carbon budget (Ref 7-30) totals, and while the Scheme will result in residual emissions post 2050, as with the UK carbon budgets, it will achieve substantial emissions reductions relative to the without-project baseline.”</i></p> <p>Would there be any emissions reductions relative to a without-project baseline which assumed similar generation from an offshore wind, other renewable scheme or nuclear, as opposed to CCGT?</p>
Q1.3.10	LCC	<p>Climate Change</p> <p>Could LCC please clarify how the assertions relating to Climate Change and GHG emissions in its WR [REP2-012] accord with the conclusion at Paragraph 7.17 of its LIR [REP1A-001] that <i>“The Council’s position is therefore that, adopting a ‘whole life’ approach to GHG emissions, there are no negative and neutral impacts and that significant positive impacts would accrue”</i>?</p>
Q1.3.11	LCC	<p>Alleged Harm</p> <p>The Council’s WR [REP2-012] states in part:</p> <p><i>“The Councils view is arguably there is no reason why a list of connected projects could not be drawn up upon sensible parameters and the clustering of solar schemes in Lincolnshire would form a sensible list</i></p>

ExQ1	Question to:	Question:
		<p><i>for such an assessment, particularly given this is the list of projects considered for other cumulative effects.”</i></p> <p>Could the Council please elaborate on this point and explain what it means when it suggests that a list of connected projects could be drawn up? Could the Council also please confirm whether it is alleging any harm in relation to Climate Change and if so, what harm and associated policy conflicts are there?</p>
4. Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations		
Q1.4.1	Applicant	<p>Compulsory Acquisition</p> <p>Can the Applicant explain why it is seeking powers of compulsory acquisition over land it is actively negotiating rights with the landowners for, and should mutual agreement be reached during the course of the examination would such CA rights still be necessary within the DCO?</p>
Q1.4.2	Applicant	<p>Cable Route</p> <p>Can the Applicant advise at what stage of the Examination they will have clarity as to the option chosen for the cable route and if it can be confirmed early on to allow focus within the examination to allow affected persons and land to be assessed.</p>
Q1.4.3	Applicant Network Rail	<p>Railways</p> <p>Can the Applicant and Network Rail confirm their current position with regards to the agreement reached on the land that both parties seek an interest in and the relevance and context of the RR received from Network Rail.</p> <p>Ref: [RR-211]</p>
5. Cumulative and in-combination effects¹		
Q1.5.1	Applicant	<p>Other projects</p> <p>WLDCs Written Representation [REP2-016] refers to the “Spherical Tokamak for Energy Production” project. Could the Applicant please explain whether this project was considered as part of the cumulative assessment? If it wasn’t, please explain why?</p>

¹ Please note that each topic includes separate questions on cumulative effects. Those included here are overarching questions.

ExQ1	Question to:	Question:
Q1.5.2	Applicant Environment Agency LLFA IDB	Pluvial Risk What are the cumulative impacts resulting from the change of the ground cover from agricultural fields to solar arrays for the totality of the solar farm developments in the region. What impact will this have on the local water table, time to peak response for watercourses and the general hydrological cycle of the area?
Q1.5.3	Applicant	Cumulative Can the Applicant confirm how the two different scenarios for cumulative effects, presented in ES paragraph 18.4.28, have been considered in all aspect assessments presented in ES Chapter 18 [APP-049]? Please provide an explanation where these scenarios have not been taken into account.
6. Draft Development Consent Order (DCO)		
Articles		
Q1.6.1	Applicant	Trees It is noted that the Applicant has advised of the need for a right to potentially fell trees subject to a tree preservation order which may have come into effect since the date of the application for this scheme. Can the Applicant advise on the issuing of any such orders to date and also if so, the justification for the new order placement and the likely impact of the proposed works on any trees so identified.
Schedule 2 - Requirements		
Q1.6.2	Applicant	Requirement 19 does not include a clause ensuring maintenance over the lifetime of project, such as '(4)... and maintained throughout the operation of the relevant part of the authorised development to which the plan relates.' Why is the maintenance requirement not for the life of the development?
Q1.6.3	Applicant	Requirement 20 sets a date of decommissioning of 60 years. Can the Applicant explain how this length of development duration has been reached and an impact assessment of lessening or lengthening of the proposal? If it is envisaged that the infrastructure will be replaced, upgraded or repowered during the lifetime of the development, why has the longer design life be adopted, how will this coincide with the decommissioning timeline and what will be the triggers for decommissioning to take place?

ExQ1	Question to:	Question:
Schedule 3 – Legislation to be disapplied		
Q1.6.4	Network Rail	What is Network Rail’s view of the disapplication of the relevant railway legislation and potential impact on their continued operation and maintenance of the existing railway network?
Schedule 15 – Protective Provisions		
Q1.6.5	All Statutory Undertakers	Can All Statutory Undertakers with Protective Provisions included within Schedule 15 of the Draft Development Consent Order advise if they are content with the provisions or challenge any parts included or missing, in particular providing detail where those items have been drawn out as outstanding and not yet subject to agreement within the relevant Statements of Common Ground?
7. Heritage		
Q1.7.1	Applicant, LCC and Historic England	<p>Assets scoped out</p> <p>ES paragraph 8.9.7 [APP-039] states: <i>“The DBA identified assets which would not experience any impacts or effects as a result of the construction, operation, or decommissioning of the Scheme and were scoped out of assessment within this ES Chapter.”</i></p> <p>Are LCC, NCC and/ or Historic England (HE) satisfied with the approach taken and the identified assets which have been scoped out?</p>
Q1.7.2	Applicant	<p>Methodology</p> <p>As noted in LCCs RR [RR-165], the assessment in the ES - in relation to some non-designated historic farmsteads [ES paragraphs 8.9.125 - 8.9.248] - concludes that the magnitude of impact is 'low' or 'very low'. Taking the assessment of Harpswell Low Farm as an example, ES Paragraph 8.9.134 [APP-039] concludes in part that <i>“the asset’s setting would be altered but this would have minimal effect on the ability to understand the asset’s heritage interests, with existing field boundaries and field patterns retained”</i>.</p> <p>This appears to be the only rationalisation of the conclusion on magnitude of impact. On that basis, is it the Applicant’s position that the 'ability to understand the assets’ heritage interests' is the key or only factor in determining the magnitude of impact? If not, then why has a more detailed explanation not been provided for concluding a 'low' magnitude of impact. What role does the change in the function of the surrounding land (away from agriculture) have on the magnitude of impact?</p>

ExQ1	Question to:	Question:
Q1.7.3	Applicant, WLDC, LCC	<p>Corringham Windmill Setting</p> <p>The ES [APP-039] considers the effect of the Proposed Development on Corringham Windmill (Grade II listed building) at paragraphs 8.9.82 to 8.9.89. In considering the setting of the building, ES Paragraph 8.9.85 states in part:</p> <p><i>“Its setting, which has been diminished by the loss of the mill buildings which contributed to its value and understanding, comprises the field in which it is located alongside the road and relationship to Corringham”.</i></p> <p>Bearing in mind the historic function of the building, is the Applicant, WLDC and LCC confident that its setting is confined to <i>“the field in which it is located alongside the road and relationship to Corringham”</i> as asserted in the ES?</p>
Q1.7.4	Applicant	<p>Cumulative Effects</p> <p>Could the Applicant please identify and provide evidence to confirm which, if any, of the heritage assets identified within the ES [APP-039] or DBA [APP-059] include settings which are affected by the Proposed Development and any other identified plan or project?</p>
Q1.7.5	Applicant	<p>Historic Landscape Character</p> <p>ES Paragraph 8.9.444 [APP-039] states in full:</p> <p><i>“Construction of the Scheme within the Principal Site would result in the longterm change of land-use from intensive agriculture to solar park renewable energy generation. Despite this, the Scheme preserves the pattern, layout and key boundaries and features of the historic landscape, enabling the grain of the two historic landscape character zones to retain their coherence, time depth and legibility. This is assessed as a low magnitude of impact on historic landscape character zones of medium value, resulting in a long-term minor adverse magnitude of impact, which is not significant.”</i></p> <p>Could the Applicant please expand or provide further evidence for this conclusion? In reaching this conclusion what comparative value has been assigned to the contribution of the existing fields within the principal site (and their associated agricultural use) towards the historic landscape character and how will the Proposed Development affect this?</p> <p>In addition, what effect would proposed landscaping (screening) measures have on the historic landscape?</p>

ExQ1	Question to:	Question:
Q1.7.6	Applicant	<p>‘Less than substantial harm’</p> <p>Planning Statement Appendix C Table 1 [AS-029] identifies the level of harm which would be caused to Heritage Assets as a result of the Proposed Development (i.e. ‘less than substantial’ in some cases). Could the Applicant please direct the ExA to the reasoning/ justification for assigning ‘less than substantial harm’ - as opposed to a greater quantum of harm - to these assets?</p>
Q1.7.7	Applicant	<p>Cumulative Effects</p> <p>ES Paragraph 18.9.11 [APP-049] seeks to address the cumulative effects on built heritage during operation. It states in full:</p> <p><i>“In terms of built heritage, operational impacts would be in relation to lighting, glint or glare, and noise and vibration. Review of the cumulative schemes suggests it is possible that cumulative effects during operation may arise due to the increased number of solar schemes, but cumulative impacts would not exceed those already assessed as not significant. While non-significant effects may be caused on an individual basis through changes to the setting of assets, the minor level of these effects and the wide geographical spread of the schemes means that these will not cumulatively increase the effects to such a level as to make them significant. As such, no significant cumulative effects on built heritage are considered likely during the operation of the Scheme.”</i></p> <p>This appears to be a very limited assessment and no further qualitative elaboration for the conclusions reached is provided. In particular, the rationale that <i>“the minor level of these effects and the wide geographical spread of the schemes means that these will not cumulatively increase the effects to such a level as to make them significant”</i> requires a much more detailed explanation based on evidence. For instance, it does not appear that any detailed assessment has been provided of the cumulative effect of the project and other developments on the settings (which may include surrounding agricultural land) of heritage assets. The same logic applies to the Applicant’s response on the cumulative impacts on historic farmsteads contained in the Applicant’s Response to Relevant Representations (PDF Page 93) [REP1-028]. Could the Applicant please provide a response?</p>
Q1.7.8	Applicant	<p>Cumulative Effects</p> <p>ES paragraph 18.9.11 [APP-049] concludes that the Tillbridge Project would not lead to cumulative effects on the setting of heritage assets above those already assessed as non-significant. ES Chapter 8 [APP-039] notes a minor adverse (not significant) effect on historic landscape character from the</p>

ExQ1	Question to:	Question:
		Principal Site. Can the Applicant provide evidence to support the conclusions, with reference to the data gathered from other cumulative projects?
Q1.7.9	Applicant	<p>Cumulative Effects</p> <p>Can the Applicant explain the difference between the Landscape and Visual Impact Assessment Cumulative Effects Assessment (ES Chapter 18 [APP-049]) - which concludes likely cumulative effects in relation to views associated with the Glentworth Oil Well – and the heritage assessment, which concludes that these views are not significant to heritage assets?</p>
Archaeology		
Q1.7.10	Applicant, LCC and NCC	<p>Survey extent – cable route</p> <p>LCC has noted that further archaeological survey work is required along parts of the cable route [RR-165]. The Applicant has identified that certain areas of the cable route have not been surveyed where it 'has not been possible' to access individual land parcels (ES Table 8-5 [APP-039]). What is the Applicant's/ LCC's / NCC's latest position on whether sufficient archaeological investigation has been carried out?</p>
Q1.7.11	Applicant	<p>Mitigation</p> <p>The ES [APP-039] identifies significant adverse effects to six non-designated archaeological assets [ES paragraph 8.10.1]. ES Section 8.10 sets out additional mitigation which it is alleged reduces these effects to 'not significant'. ES paragraph 8.10.2 states in part:</p> <p><i>“Where embedded mitigation or design measures cannot be employed to avoid or protect these heritage assets, and where reasonably practicable, significant adverse effects should be offset through the implementation of a programme of archaeological mitigation measures.”</i></p> <p>However, can the Applicant explain or direct the ExA to evidence which explains how/ why situations would arise where embedded mitigation and design measures could not be 'employed'?</p>
Q1.7.12	Applicant, LCC and NCC	<p>Mitigation</p> <p>Are LCC and NCC satisfied that dDCO Requirement 11 [REP1-057] is sufficient to ensure that the mitigation outlined at ES Section 8.10 is delivered effectively? In relation to this point, do the Councils and the Applicant consider that the dDCO makes provision/ controls the “coordinated programme of archaeological investigation and mitigation” for the cable route, as suggested in ES Paragraph 18.9.5 [APP-49]?</p>

ExQ1	Question to:	Question:
Q1.7.13	LCC	<p>Viking Winter Camp</p> <p>In relation to the Winter Camp of the Viking Great Army, the Planning Statement Appendix C Paragraph 5.1.4 [AS-029] states in full:</p> <p><i>“The construction of the Scheme has the potential to result in the disturbance or loss of a small section of surviving archaeological remains, if they survive within the Order limits. This will cause harm to the significance of the asset, but, given the location of the impact towards the periphery of the winter camp and not within the core of settlement activity, as it is currently understood, that harm will be less than substantial with the asset’s heritage significance not being significantly lost or altered.”</i></p> <p>Is LCC satisfied with this conclusion and the basis upon which it has been reached?</p>
Q1.7.14	Historic England, LCC and NCC	Could the statutory parties please provide representations in relation to the Archaeological Mitigation Strategy [REP1-025] submitted by the Applicant?
8. Human health, safety, accidents and major incidents		
Q1.8.1	Applicant	<p>Health and Mental Health Impacts on surrounding communities</p> <p>Numerous representations have been received stating that members of the community local to the proposed development have suffered health effects during the development of this application and will continue to do so, and potentially increase during the construction period and throughout the life of the development. Could the Applicant address this concern and assess the potential for impact; and highlight any measures put in place to reduce and minimise these impacts. An assessment of the associated impact on mental health of communities adjacent to large scale development should be prepared.</p>
Q1.8.2	Applicant LCC	<p>Fire Safety</p> <p>What are LCC’s and in particular their Fire and Rescue Services views on the adequacy and provisions within the Battery Safety Management Plan and the resources and access arrangements proposed? Does the proposal align with the National Fire Chief Councils guidance to Fire and Rescue Services on Grid Scale BESS?</p> <p>Ref: 6.1 Chapter 10 Water Environment & Framework Battery Safety Management Plan [APP-225].</p>

ExQ1	Question to:	Question:
Q1.8.3	Applicant	<p>Fire Safety</p> <p>What is the probability of a battery safety incident, notably a fire or thermal runaway event, occurring throughout the life of the development; and what would the potential impact from this type of incident be?</p> <p>Ref: 6.1 Chapter 10 Water Environment & Framework Battery Safety Management Plan [APP-225].</p>
Q1.8.4	Applicant HSE Uniper	<p>Control of Major Accident Hazards</p> <p>What are the risks associated with the cable route approach and incursion into the Major Accident Hazard Site and Major Accident Hazard Pipeline sites and how have these risks been mitigated?</p> <p>Ref: 6.1 Chapter 17 Other Environmental Topics [APP-048].</p>
Q1.8.5	Applicant LA HSE	<p>Control of Major Accident Hazards</p> <p>What are the associated risks arising from the potential increase in the Glentworth K oil site within the principal site boundary?</p> <p>Ref: 6.1 Chapter 17 Other Environmental Topics [APP-048].</p>
Q1.8.6	Applicant NATS MoD	<p>Aviation</p> <p>What are the risks to aviation from the solar panels and the potential for interference visually and electromagnetically?</p> <p>Ref: RR-002 A Pilot.</p>
Q1.8.7	Applicant	<p>Electromagnetic Field effects</p> <p>What is the Electromagnetic Field risk to adjacent properties from the proposed bundled cable allowing for the transmission loading of all cables in the route combined?</p> <p>Ref: 6.1 Chapter 17 Other Environmental Topics [APP-048].</p>
9.	Landscape and visual impact	
Q1.9.1	Applicant	<p>Residential Receptors and Amenity</p> <p>Can the Applicant explain why, in considering the Landscape and Visual Impact Assessment (LVIA) in relation to residential amenity, only viewpoints 7, 9 and 13 are referred to at ES Paragraph 12.8.44 [APP-043]? Where in the LVIA or ES has it been demonstrated that consideration has been given to specific residential receptors (in very close proximity to the site)? Related to this point, other than for</p>

ExQ1: 19 November 2024

Responses due by Deadline 3: Tuesday 10 December 2024

ExQ1	Question to:	Question:
		<p>viewpoints 7,9 and 13 where has an absence of a Residential Visual Amenity Assessment been justified, particularly taking into account –</p> <p>1: that LSE have been identified in relation to other viewpoints in close proximity to residential receptors (Viewpoint 1 for example); and</p> <p>2: the presence of dwellings within the main area of the principal site (albeit excluded from the Order Limits, see ES Paragraph ES 12.6.14).</p> <p>In responding, please consider any consequences for the related assessment of human health at ES Chapter 11 [APP-042] paragraph 11.8.45 onwards.</p>
Q1.9.2	Applicant	<p>LVIA</p> <p>The LVIA [APP-101 to APP-106] of the cable route corridor has been completed using site visits from public access areas. Can the Applicant explain what limitations, if any, this has placed on the baseline that has been gathered?</p>
Q1.9.3	Applicant	<p>ZTV</p> <p>Can the Applicant explain the reason why the Cumulative ZTVs at Figures 18-2, 18-3 and 18-4 of the ES [APP-204 to APP-206] are not combined such they include all four schemes (Tillbridge, Cottam, West Burton, Gate Burton)?</p>
Q1.9.4	Applicant	<p>ZTVs</p> <p>ES Paragraph 12.4.13 [APP-043] states in full:</p> <p><i>“It should be noted that the ZTVs for the solar PV panels do not demonstrate the theoretical visibility of such features across the entire Principal Site. Due to computer processing capabilities, reference points were taken from the outer boundary of the Panel areas. As such, some areas of panels, particularly along slightly higher topography such as the north-south ridge between the A631 and Harpswell Wood, may increase theoretical visibility beyond that shown.”</i></p> <p>On that basis are the ZTVs accurate? Could the Applicant model the Zones of Theoretical Visibility (ZTV) on the basis of the boundaries and the higher topography within the Order Limits?</p>
Q1.9.5	Applicant	<p>Figure 12.5</p> <p>With Q1.9.3 in mind, ES Figure 12.5 [APP-043] could more effectively illustrate the site topography if it only indicated the topography within the Order Limits. This is because it includes The Cliff, which significantly reduces the usefulness of the gradient colours used to illustrate the change in levels across</p>

ExQ1	Question to:	Question:
		the site. Can the Applicant therefore address this and provide a separate Figure illustrating the site topography within the Order Limits?
Q1.9.6	Applicant	<p>Residential Properties ES Paragraph 12.3.5 [APP-043] states: <i>“Professional judgement has been used to assess residents’ views where it has not been possible to ascertain levels of visibility from gardens and inside properties through accompanied visits. Such judgements have been aided by aerial photography and fieldwork observations from the surrounding area.”</i> Can the Applicant explain what efforts were made to assess visual impact from private residential properties?</p>
Q1.9.7	Applicant	<p>Assumptions ES 12.3.11 [APP-043] states: <i>“For the year 15 operation (2043), the LVIA assumes that the Scheme is operational across all of the Order limits, the season is summer and vegetation and proposed planting is in leaf.”</i> Why has summer been chosen as opposed to winter?</p>
Q1.9.8	Applicant	<p>Decommissioning ES Paragraph 12.3.12 [APP-043] states in part: <i>“The assessment for the decommissioning is undertaken for the winter season with the duration of this phase being between 12 and 24 months.”</i> How has the Applicant determined the likely decommissioning period and does this represent a 'worst-case scenario'?</p>
Q1.9.9	Applicant	<p>Substations ES Paragraph 12.4.4 [APP-032] states: <i>“As the boundary to the Principal Site became established, preferred locations for infrastructure were identified, including on-site substations, storage compounds, access routes and office locations. These were sited to take advantage of existing screening by vegetation and limit impacts on sensitive receptors such as residential properties.”</i> Can the Applicant be more specific about the rationale for the location of the substations with particular regard to 'existing screening'?</p>

ExQ1: 19 November 2024

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ExQ1	Question to:	Question:
Q1.9.10	Applicant	<p>Glentworth Hall</p> <p>Is there any particular reason why there is no viewpoint (ES Figure 12-12 [APP-184]) located between Glentworth Hall (Grade II* Listed) and the Principal Site, particularly given the; significance of this Listed Building; topography and close proximity?</p>
Q1.9.11	Applicant and LCC	<p>New Bridleway Update</p> <p>ES Paragraph 12.6.17 [APP-043] states:</p> <p><i>“At the time of ES preparation, an application to claim a new bridleway has been submitted to LCC, reinstating a section of the historic ‘low’ route along the base of the Cliff between Harpswell and Glentworth, parallel to Middle Street.”</i></p> <p>Can LCC and the Applicant please provide an update?</p>
Q1.9.12	Applicant	<p>PROW locations</p> <p>ES Paragraphs 12.6.105-12.6.108 and 12.6.122 [APP-43] outline the Public Rights of Way (PRoW) where the site is theoretically visible from. Can the Applicant label these PRoW on Figure 12-7 [APP-179]?</p>
Q1.9.13	Applicant	<p>Cumulative Effects Assessment Terminology</p> <p>In terms of Cumulative effects, ES Paragraph 18.4.29 [APP-049] states:</p> <p><i>“The significance of effect interactions (also referred to as combined effects) and cumulative effects has been determined in accordance with the criteria set out in Table 18-6. The terminology for significance of effect differs from the general assessment methodology, presented in Chapter 5: EIA Methodology of this ES [EN010142/APP/6.1], so that the significance of cumulative effects can be differentiated.”</i></p> <p>Does the use of different terminology allow for an easy comparison between effects in isolation and cumulative effects? For example, is ‘minor’ equivalent to ‘slight’? It would be useful if the Applicant could provide a table or explanation as to the relationship between the terminology used in the rest of the ES and that used in this Chapter.</p>
Q1.9.14	Applicant	<p>Cumulative Effects - Sequential</p> <p>How does ES Paragraph 18.13.16 ES [APP-049] consist with the consideration of 'sequential impacts' at 18.13.3b. It is also noted that Table 18-10 and 18-11 both 'screen out' developments on the basis of intervening distance but how does this take into account sequential impacts (effects arising from receptors moving through the landscape)?</p>

ExQ1: 19 November 2024

Responses due by Deadline 3: Tuesday 10 December 2024

ExQ1	Question to:	Question:
		<p>In addition, the brief assessment of sequential views is noted at ES Paragraphs 18.13.21 to 18.13.28, however, the conclusions at paragraph 18.3.28 do not assign the same assessment terms to the effects as those listed at Table 18-6 and used elsewhere in the Chapter. Can the Applicant explain why and expand on the conclusions reached at ES paragraph 18.3.28?</p>
Q1.9.15	Applicant	<p>ZTV Methodology and Visualisation Methodology</p> <p>Paragraph 3.8 of the Landscape & Visual Review attached to LCC’s LIR [REP1A-001] states in full: <i>“The process of modelling Zones of Theoretical Visibility (ZTVs) is described within paragraphs 12.4.12 and 12.4.13. These paragraphs are not explicit regarding what parameters the proposals have been modelled to and it has been assumed that the ZTV is generated using the maximum parameters provided within Chapter 3: Scheme Description, as this would provide a ‘worst case’ ZTV. However, this needs to be clarified.”</i></p> <p>Furthermore, paragraph 3.9 (not numbered) questions the visualisation methodology. Can the Applicant please provide a response?</p>
Q1.9.16	Applicant	<p>Access and Highway Elements</p> <p>Paragraph 4.15 of the Landscape & Visual Review attached to LCC’s LIR [REP1A-001] asserts that <i>“access, and the wider highways elements of the scheme do not appear to be fully considered in the LVIA beyond increased traffic during construction and decommissioning phases”.</i></p> <p>Can the Applicant please provide a response?</p>
Q1.9.17	Applicant	<p>Visual Assessment</p> <p>Can the Applicant provide a response to the discrepancies highlighted at paragraphs 5.12 to 5.13 of the Landscape & Visual Review attached to LCC’s LIR [REP1A-001]?</p>
Q1.9.18	LCC and Applicant	<p>Effect of mitigation planting</p> <p>LCC LIR paragraph 5.14 [REP1A-001] states in part: <i>“This reduced to three receptors or viewpoints experiencing significant residual effects at year 15 which suggests a potential over reliance upon mitigation planting to screen the proposals without full attention to the potential impact of this screening on the landscape.”</i></p> <p>Could LCC please explain the rationale for the conclusion that there is an over reliance on mitigation planting and clarify what this means in terms of the effects. Could the Applicant please provide a response to paragraph 5.14?</p>

ExQ1	Question to:	Question:
Q1.9.19	Applicant	<p>Visual Assessment</p> <p>Could the Applicant please provide a response to paragraphs 5.15 to 5.17 of Landscape & Visual Review attached to LCC’s LIR [REP1A-001].</p>
Q1.9.20	WLDC	<p>Explanation for conclusions</p> <p>Could WLDC please provide further explanation for the conclusions reached at paragraphs 6.15 to 6.40 of its LIR [REP1A-005]? The conclusions with regard to effects of the Proposed Development are noted but can WLDC provide any assessment which supports these conclusions?</p>
Q1.9.21	WLDC and Applicant	<p>Requirement 7 – OLEMP</p> <p>Paragraph 6.44 of WLDC’s LIR [REP1A-005] states in part:</p> <p><i>“WLDC does however maintain concerns around the cumulative approach and impacts upon the successful implementation of the OLEMP (e.g. within the cable corridor). More detail around how projects will be phased and mitigation delivered is required to avoid abortive implementation of measures, which could elongate the time period for when mitigation is delivered.”</i></p> <p>Could WLDC please expand on what it means with reference to ‘abortive implementation’ and set out what additional detail is required? Could the Applicant also respond to this point?</p>
10. Noise and vibration		
Q1.10.1	Applicant	<p>Inverters</p> <p>The Applicant has updated the noise modelling [AS-009] to reflect that it has a new figure (84dB(A) as opposed to 88dB(A)) for operational noise from inverters. Could the Applicant please explain why this figure has changed? How has this affected the assessment contained within the ES?</p>
Q1.10.2	Applicant	<p>Contour Drawing</p> <p>ES Figure 13-2, which is the noise contours drawing [AS-017], has been revised. However, this appears to show an increase in noise in the SE corner of the Principal Site despite a reduction in inverter operational noise. Could the Applicant explain why the contour drawing appears to show increased noise in certain locations? If there is an increase then how does this affect the assessment contained in the ES?</p>
Q1.10.3	Applicant	<p>Other developments</p> <p>ES Paragraph 13.3.2 [AS-006] states:</p>

ExQ1	Question to:	Question:
		<p><i>“While some temporary changes in baseline noise levels between the time of the baseline monitoring and the anticipated construction period may occur in some localities due to temporary noise sources such as construction works, no developments are understood to be proposed that may influence noise levels in the operational noise Study Area (defined in paragraph 13.4.3) that would lead to a major additional and ongoing noise source which would notably alter the local baseline noise environment prior to 2028 (e.g. highway or railway schemes, major industrial facilities).”</i></p> <p>Does this take into account the projects identified in ES Chapter 18 [APP-049]?</p>
Q1.10.4	Applicant	<p>Noise Modelling Data</p> <p>Paragraphs 4.1.5 to 4.1.7 of the ES Appendix 13-4 (Noise Modelling) [AS-008] refer to sound level data from battery storage units and substation plant. The paragraphs explain that these data are based on similar developments in the AECOM library. Please could the Applicant direct the ExA to any application document which expands on this? If not, could the Applicant please provide evidence to support the use of data outlined in these paragraphs (for example with reference to specification sheets)?</p>
Q1.10.5	Applicant	<p>Assumptions</p> <p>ES Chapter 13 Paragraph 13.3.10 [AS-006] sets out the 'operational assumptions and limitations' which underpin the operational noise model. This paragraph states in part:</p> <p><i>“Digital noise modelling of the Scheme once it is operational has been based on the parameters set out in Figure 3-1: Indicative Principal Site Layout Plan of this ES.”</i></p> <p>However, this plan does not appear to set parameters for the location of inverters, transformers and BESS given its indicative role. Where has the Applicant assumed that the different parts of the development (for example ‘solar stations’ and ‘BESS’) would be located for the purpose of undertaking the operational noise model? If the assumption is that they would be in the locations indicatively shown on Figure 3-1 [APP-128], then how does this allow for a worst-case scenario assessment for alternative locations for BESS units and Solar Stations (allowed under the Works Plans, subject to the 250m parameter for residential properties set out in the Outline Design Principles Statement)?</p> <p>Please note that the Technical Note at Appendix C of the Applicant’s Responses to Relevant Representations [REP1-028] appears to focus on a worst-case scenario (scenario 1). Has the same approach been taken to the noise modelling at ES Appendix 13-4 [AS-008]?</p>

ExQ1	Question to:	Question:
Q1. 10.6	Applicant	<p>Tillbridge Solar Project Acoustics Technical Note</p> <p>Paragraph 4.2.2 of the Technical Note at Appendix C of the Applicant’s Responses to Relevant Representations [REP1-028] states in full:</p> <p><i>“The results of noise predictions at East Cottage, presented as specific noise levels, are summarised in Table 4-1. Full modelling results for Scenario 3a (i.e. the illustrative scheme included within the DCO application) are presented within the appendices of this technical note.”</i></p> <p>Why have the full modelling results for the other scenarios not been provided (in particular scenario 1)?</p>
Q1. 10.7	Applicant	<p>Requirement 17</p> <p>Draft DCO [APP-014] Requirement 17 relates to operational noise. Given that ‘the Applicant commits that noise at sensitive receptors will be no higher than the levels presented in Section 13.8 of Chapter 13: Noise and Vibration of the ES’ (see paragraph 5.1.1 of the Technical Note at Appendix C of the Applicant’s Responses to Relevant Representations [REP1-028]), what is the Applicant’s view on whether it would be acceptable to impose noise limits (in particular in relation to East Cottage, Northlands Road) within this requirement? In this regard, please also note the final sentence of paragraph 4.1.3 of the Technical Note.</p>
Q1. 10.8	Applicant	<p>Tillbridge Solar Project Acoustics Technical Note</p> <p>a) Could the Applicant please explain whether the medical condition identified in representations from the occupier of a residential property (pertaining to the Technical Note’s [REP1-028] assessment) has been taken into account?</p> <p>b) If not, why not? Has the Applicant considered additional mitigation measures in this regard?</p> <p>c) Is the Applicant aware of any best-practice guidance on acoustic assessment in such instances and has it been followed?</p> <p>Given that a response to this question may contain information regarding an individual’s health, please separate this response and mark it as confidential such that it can be redacted prior to publication if necessary.</p>
Q1. 10.9	Applicant	<p>Outside of construction hours</p> <p>ES Paragraph 13.4.22 [AS-006] states:</p> <p><i>“Some works activities may need to occur out of these hours/times due to activities requiring to be undertaken continuously (such as trenchless methods – part of NGA5) if it is not safe or practical to end</i></p>

ExQ1	Question to:	Question:
		<p><i>it at 19:00 on a particular day. Where work outside of times is necessary, prior notification will be provided to the Local Planning Authority (LPA), in the form of a Control of Pollution Act (CoPA) (Ref 1-9) Section 61 consent application where necessary.”</i></p> <p>Could the Applicant please explain how the DCO would ensure that this is the case (i.e. where in the dDCO is there a provision to control this)? Please note that the FCEMP [REP1-055] states that consents under s61 of CoPA 'would be voluntarily obtained'.</p>
Q1. 10.10	Applicant	<p>Outside of construction hours</p> <p>Following on from the previous question, has the Applicant assumed any periods of construction activity falling beyond the normal construction hours and how has this been factored into the noise assessment/modelling?</p>
Q1. 10.11	Applicant	<p>Change in layout</p> <p>ES Chapter 13 Paragraph 13.7.16 [AS-006] states:</p> <p><i>“Consequently, if there is a decision in the future to move noise generating infrastructure closer to sensitive receptors than shown in Figure 13-1: Noise Sensitive Receptors and Noise Monitoring Locations of this ES [EN010142/APP/6.3], the Applicant commits that noise at sensitive receptors will be no higher than the levels presented in Section 13.8. This commitment will be secured through a requirement of the draft DCO [EN010142/APP/3.1].”</i></p> <p>Which requirement achieves this and how would it be enforced (and by whom)?</p>
Q1. 10.12	Applicant	<p>Vibration – prior warning</p> <p>In relation to vibration, ES Paragraph 13.8.22 [AS-006] states in part:</p> <p><i>“For PPV vibration levels anticipated to exceed 1.0mm/s, prior warning will be provided on the timings and duration of vibration generating activities. This will be secured through the Framework CEMP [EN010142/APP/7.8] and Framework DEMP [EN010142/APP/7.10], which will be secured through the DCO.”</i></p> <p>Where is provision made for this within the FCEMP and FDEMP?</p>

ExQ1: 19 November 2024

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ExQ1	Question to:	Question:
Q1. 10.13	Applicant	<p>Construction and decommissioning traffic noise ES Paragraph 13.8.26 [AS-006] states in part: <i>“The construction compounds are located between 2 and 5km apart along the Cable Route Corridor and therefore any one access would only be utilised for up to two months for the primary construction activities, excluding cabling and jointing bays activities”</i> Could the Applicant please explain how a maximum period of two months has been calculated and does this represent a worst-case scenario? Is it controlled by the dDCO?</p>
Q1. 10.14	Applicant	<p>HGV Movements ES Paragraph 13.8.29 [AS-006] states that HGV movements will be distributed evenly across a 10-hour window. How will this be controlled? Is this a worst-case?</p>
Q1. 10.15	Applicant	<p>Construction overlap Paragraph 13.9.3 [AS-006] states: <i>“A method of scheduling construction traffic from different work teams so they do not overlap is secured in the Framework CEMP [EN010142/APP/7.8] and the Framework DEMP [EN010142/APP/7.10].”</i> Where in the FCEMP/ FDEMP is this addressed?</p>
Q1. 10.16	Applicant	<p>Cumulative effects ES Paragraph 18.14.5 [APP-049] states in part: <i>“Even if other solar DCOs construct their Cable Route Corridor at the same time as the Scheme, it is unlikely that the worst-case scenario would be exceeded. However, the duration of these works is likely to be extended and, hence, the duration that receptors may be exposed to noisy works out of core hours would be increased. This extended exposure may affect the level of mitigation required for out-of-hours trenchless crossing work activities in which case the Section 61 process will be followed.”</i> Could the Applicant please confirm what effect would this have on the noise calculations presented in Chapter 13 [AS-006]?</p>
Q1. 10.17	Applicant	<p>Cumulative effects ES Paragraph 18.14.6 [APP-049] seems to indicate that an assumption is made that other projects will be subject to best practice and CEMPs and that ultimately this would mean the cumulative effects would be neutral. However, could the Applicant please explain whether a quantitative assessment of</p>

ExQ1	Question to:	Question:
		<p>cumulative effects has been carried out? If not, then why not, particularly given that (in the case of Gate Burton, West Burton and Cottam) these data (in the form of application documents) are readily available to undertake such an assessment?</p> <p>The ExA notes that a quantitative approach has been taken with regard to cumulative traffic noise at Table 18-20. Why not over facets of construction and operation? For reference, the transport section of the cumulative Chapter has taken a much more thorough and quantitative approach to cumulative effects.</p>
Q1. 10.18	Applicant	<p>Cumulative effects ES Paragraph 18.14.14 [APP-049] states: <i>“Although noise levels at R14 and NR2 may increase as a result of cumulative noise, the increase would be less than 3 dB and not perceptible to the average person.”</i> How has this figure been derived and where is the evidence of this?</p>
Q1. 10.19	Applicant	<p>Replacement Panels Has the Applicant undertaken an assessment of noise resulting from the replacement of panels, batteries and other development? If so, what are the assumptions behind this? If not, why not?</p>
Q1. 10.20	Canal and River Trust	<p>Response to Applicant In relation to noise and vibration, does the Canal and River Trust have any response to the representations made by the Applicant in the document titled ‘Applicant’s Responses to Relevant Representations’ [REP1-028] (PDF Page 31)?</p>
11.	Socio-economic effects	
Q1. 11.1	Applicant	<p>Amenity Planning Statement 6.14.30 states: <i>“The assessment of amenity effects in Chapter 14: Socio-economic and Land Use of the ES [EN010142/APP/6.1] has considered effects from Chapter 16: Transport and Access, Chapter 13: Noise and Vibration, Chapter 12: Landscape and Visual Amenity, and Chapter 6: Air Quality of the ES [EN010142/APP/6.1]. It concludes that considering the residual effects of these assessments results, and the proposed mitigation including woodland and hedgerow planting, appropriate control measures during construction and decommissioning and the securement of design principles for the detailed</i></p>

ExQ1	Question to:	Question:
		<p><i>design, there would be no receptors that would experience a significant effect on their amenity, and as such there would be no effect during all phases of the Scheme.</i></p> <p>How is this paragraph consistent with the conclusions on 'effect interactions' at ES Table 18-7 for certain residential receptors where 'significant effects' have been identified?</p>
Q1. 11.2	Applicant	<p>Farming</p> <p>ES paragraph 14.6.21 [AS-029] states:</p> <p><i>“As noted in Chapter 15: Soils and Agriculture of this ES [EN010141/APP/6.1], a soils and agriculture assessment work preapplication would be deficient for informing works in the Cable Route Corridor. As the works are brief with no loss or degradation of soils or agricultural land, this is not assessed in Chapter 15: Soils and Agriculture [EN010141/APP/6.1]. Therefore, only the Principal Site has been detailed in the existing socio-economic baseline and assessed for socio-economic and land use effects.”</i></p> <p>However, based on a worst-case construction period, what assessment has been undertaken on the effect of construction on the cable route corridor (a period within which at certain times agricultural land may not be farmed, for example)?</p>
Q1. 11.3	Applicant	<p>Agricultural barns planning application</p> <p>In relation to the cable route, ES paragraph 14.6.49 [APP-045] states that a planning application for two agricultural barns was submitted to WLDC in November 2022 (application ref. 145882) and that <i>“it is anticipated that a solution can be found for the barns to be constructed in a way and in a location such that it would not affect the Scheme and vice versa”</i>.</p> <p>Could the Applicant update the ExA on whether any such solution has been found?</p>
Q1. 11.4	Applicant	<p>Employment generated</p> <p>ES paragraph 14.8.4 [APP-045] states in part:</p> <p><i>“The Applicant estimates that the Scheme will require a peak of 1,395 full-time equivalent (FTE) jobs, and an average of 812 gross direct FTE jobs on-site over the 24-month construction period.”</i></p> <p>Could the Applicant explain:</p> <p>a) how these figures were derived, with specific reference to relevant projects or evidence; and</p> <p>b) the number of employees estimated for each type of employment (as specified in Table 2.4 of the Framework Skills, Supply Chain and Employment Plan [APP-232])</p>

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ExQ1	Question to:	Question:
Q1.11.5	Applicant	<p>Local Employment</p> <p>ES paragraph 14.8.6 [APP-045] states in part that 15% of construction staff could be sourced from within the 60-minute drive time Study Area. Which specific construction jobs would this apply to?</p>
Q1.11.6	Applicant	<p>The ‘Multiplier Effect’</p> <p>ES paragraph 14.8.11 [APP-045] states in part that employment growth will be likely to arise locally through manufacturing services and suppliers to the construction process. Could the Applicant explain what sort of manufacturing services and suppliers are being referred to here and their locations?</p>
Q1.11.7	Applicant	<p>Gross Value Added</p> <p>ES paragraph 14.8.23 [APP-045] applies a Gross Value Added (GVA) per construction worker to the development. The total, based on ONS data, is £57,200 per worker. Could the Applicant please explain in more detail what this figure encompasses and whether the ONS data is applicable to construction workers working and staying away from home?</p>
Q1.11.8	Applicant	<p>Agricultural Land</p> <p>ES paragraph 14.8.31 [APP-045] sets out proportions of overall agricultural land. Is this based only on the areas proposed for the siting of onsite substations and woodland? If so, why? What assessment has been undertaken of the socio-economic effects resulting from effects on agricultural production over the entire principal site and cable route corridor over the lifetime of the Proposed Development?</p>
Q1.11.9	Applicant	<p>‘Local land use and amenity’</p> <p>ES paragraph 14.8.35 [APP-045] states:</p> <p><i>“Taking into account the residual effects assessment results of the air quality, noise and vibration, traffic and transport and visual assessments relating to the construction activities, there are no receptors that would experience a significant effect on their amenity during construction, and as such there would be no effect.”</i></p> <p>Does this mean that in order for there to be any socio-economic effect, the effects arising in other topic areas must be 'significant'? If so, why? For example, is a 'slight adverse' noise effect assumed to result in 'no effect' on amenity?</p>
Q1.11.10	Applicant	<p>Further to Q1.11.9, does ES paragraph 14.8.35[APP-045] take into account the in-combination effects set out in ES Table 18-7 and 18-8 [APP-049], where in some cases 'significant effects' are identified?</p>

ExQ1	Question to:	Question:
Q1. 11.11	Applicant	<p>Existing employment</p> <p>ES paragraph 14.8.49 [APP-045] states in part: <i>“The Principal Site consists of agricultural land, and the Applicant has estimated that there are around 10 existing jobs supported by agricultural activities on the Principal Site.”</i></p> <p>How has this figure and those contained in ES Table 14-20 been derived?</p>
Q1. 11.12	Applicant	<p>Wider Employment and socio-economic effects</p> <p>At PDF page 139 of the Applicant’s Response to Relevant Representations [REP1-028], the Applicant asserts that the <i>“Principal Site currently supports 10 jobs through agricultural activities, which will be offset by the provision of 11 jobs running and managing the Scheme whilst its in operation”</i>.</p> <p>Could the Applicant please direct the ExA to any assessment of the effect of the socio-economic impact of the Proposed Development on the wider rural economy (for example, employment in the local area which is currently supported by agricultural production on the application site)? If not, then why has no such assessment been undertaken?</p>
Q1. 11.13	Applicant	<p>Tourism</p> <p>The ExA notes the Applicant’s response to Stow Parish Council on PDF page 140 of the Applicant’s Response to Relevant Representations [REP1-028] in relation to ‘tourism’. Whilst the ExA acknowledges the Applicant’s comments in relation to the ES, can the Applicant direct the ExA to any detailed explanation or analysis of the effect of the Proposed Development on tourism in the application documents and if not, why not?</p>
Q1. 11.14	WLDC and Applicant	<p>Tourism</p> <p>Paragraph 8.14 of the WLDC LIR [REP1A-005] states in full: <i>“Notwithstanding the Applicant’s assessment, WLDC has significant concerns regarding the potential impact upon the tourism industry, which would begin got be impacted through the influx of workers employed on a number of projects over a significant period of time (up to a decade).”</i></p> <p>Could WLDC please provide an explanation for this conclusion and identify what effect this would have (using EIA terminology)? Could the Applicant please respond to this point?</p>

ExQ1	Question to:	Question:
12.	Soils and Agriculture	
Q1. 12.1	Applicant	<p>Agricultural Land</p> <p>What is the likely impact on ALC of the proposed cable route and what mitigation has been proposed in advance assuming a reasonable worst case scenario?</p> <p>Ref: 6.1 Chapter 15 Soils and Agriculture [APP-046].</p>
Q1. 12.2	Applicant	<p>Agricultural Land</p> <p>What mechanisms have been proposed within the dDCO to secure the grazing of the principal site during its life?</p> <p>Ref: 6.1 Chapter 15 Soils and Agriculture [APP-046].</p>
Q1. 12.3	Applicant	<p>Agricultural Land</p> <p>How does the baseline report align to the requirements of the written ministerial statement “Solar and protecting our Food Security and Best and Most Versatile (BMV) Land” issued on 15 May 2024?</p> <p>Ref: 6.2 Appendix 15-2 Agricultural Land Classification Baseline Report [APP-116].</p>
Q1. 12.4	Applicant	<p>Agricultural Land</p> <p>Can it be demonstrated that the sequential test has been applied to BMV or that an alternative brown field site was considered within this site selection exercise?</p> <p>Ref: 6.2 Appendix 15-2 Agricultural Land Classification Baseline Report [APP-116].</p>
Q1. 12.5	Applicant Natural England	<p>Agricultural Land</p> <p>What are the potential implications of the land being laid to rest, not ploughed or cropped for 60 years versus the existing management regime and how might this affected the classification and quality of the land in the long term?</p>
Q1. 12.6	Applicant	<p>Agricultural Land</p> <p>What has been the agricultural use of the land within the order limits for the last 10 years, including planting, ploughing and harvesting regime, yields and net production? How does this compare the average yields for the region and nationally; and what is the effective net reduction in agricultural output by taking these fields out of production for the next 60 years?</p>

ExQ1 13.	Question to: Transport and access	Question:
Q1. 13.1	Applicant	<p>Cumulative effects</p> <p>The ES outlines that the North Humber to High Marnham Energy Grid upgrade has been scoped out of the assessment of cumulative effects. The reason given is that the construction period is deemed to be different to that of the Proposed Development (see ES paragraph 18.7.4d [APP049]). However, NGETs Relevant Representation [RR-206] indicates that construction is likely to overlap. Could the Applicant explain the rationale applied in 'screening' out this development, taking into consideration NGETs representation?</p>
Q1. 13.2	Applicant	<p>Cumulative effects</p> <p>ES paragraph 18.17.2 [APP-049] states:</p> <p><i>“The developments identified above have been screened for spatial and temporal overlaps with the Scheme. For transport and access, this relates to the roads in the vicinity of the Scheme that are expected to be used to access each of the relevant schemes during the peak construction period in 2026.”</i></p> <p>Could the Applicant direct the ExA to a detailed explanation of how this screening process was undertaken. In particular, can the Applicant please explain exactly why certain ATC (Automatic Traffic County Survey) locations identified for the Proposed Development within the Transport Chapter of the ES have been excluded? It would also assist the ExA if all ATC locations included in the Transport Chapter could be mapped onto ES Figure 18-5 to allow for a clearer understanding on this matter.</p>
Q1. 13.3	Applicant	<p>Rail Crossings</p> <p>ES Paragraph 16.4.53 [APP-047] states in part that the Proposed Development has the potential to generate impacts on rail assets such as bridges and level crossings due to HGV movements during construction and decommissioning. Whilst it is recognised that there is a FCTMP [REP1-021] and HGV Routing Strategy [APP-118], where is the assessment of the potential effects during construction and decommissioning on the rail network. Indeed, it is noted that the cable route would cross the operational rail network in several locations. Network Rail's Relevant Representation [RR-211] identifies these cable crossings as T16 and T8 on ES Figure 3-11 [APP-140].</p>

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ExQ1	Question to:	Question:
Q1. 13.4	Applicant	<p>Cumulative effects</p> <p>ES paragraphs 18.17.13 and 18.17.32 [APP-049] outline that only certain parcels have been ‘focused on’ in respect of Cottam and West Burton. Can the Applicant confirm whether there are any other parcels where construction might require use of the highway network within the Tillbridge Study area? If not, where is the evidence of this? Or alternatively, if so, then has the cumulative assessment considered the effects on these?</p>
Q1. 13.5	Applicant	<p>Cumulative effects</p> <p>ES paragraph 18.17.17 [APP-049] concludes that West Burton parcel WB2 can be scoped out. However, is this a worst-case-scenario? Particularly given that the DCO has not yet been made. Furthermore, is the Cottam CTMP subject to approval under a requirement of the DCO and therefore subject to change?</p>
Q1. 13.6	Applicant	<p>Cumulative Effects</p> <p>ES paragraph 16.8.48 [APP-047] states in part:</p> <p><i>“One significant effect on transport and access across the construction phase has been identified as a result of the Scheme (a moderate adverse (significant) effect on severance/ pedestrian delay/ NMU amenity on the B1241 (ATC 23).’ ES Paragraph 16.10.1 identifies that ‘one significant residual effect has been identified during the construction phase as a result of the Scheme: severance/ pedestrian delay/ NMU amenity on the B1241 (ATC 23).”</i></p> <p>However, there does not appear to be any assessment of the cumulative effects on severance/ pedestrian delay/ Non-Motorised User (NMU) amenity in the ES Chapter 18 [APP-049]. Could the Applicant please explain why? It is noted that paragraph 16.10.2 makes reference to the shared cable route, but should this form part of the assessment and be included in the cumulative assessment at ES Chapter 18?</p>
Q1. 13.7	Applicant	<p>Panel Replacement</p> <p>ES paragraph 16.4.50 [APP-047] states in full:</p> <p><i>“If full Panel and BESS replacement is required at some point during the lifetime of the Scheme, activity would be considerably less intensive than during construction, and is anticipated to generate approximately 10% of the daily HGV/coach and car/LGV movements estimated to be generated during peak construction of the Principal Site and Cable Route Corridor.”</i></p>

ExQ1	Question to:	Question:
		How has the 10% figure been derived and where is the evidence of this?
Q1. 13.8	Applicant, LCC, NCC	<p>Baseline Data</p> <p>ES paragraph 16.6.27 [APP-047] outlines that baseline traffic data is based on surveys undertaken between 10 – 19 July 2022. Are the Councils and the Applicant satisfied that this is a representative period for the purposes of providing baseline data?</p>
Q1. 13.9	Applicant	<p>Collisions</p> <p>ES paragraph 16.8.29 [APP-047] states in full: <i>“A total of five collisions, four slight and one serious, were recorded in the vicinity of the A1500/ B1241 Sturton by Stow junction during the five-year study period, equivalent to one collision per year. All five collisions occurred at similar locations and as such, this part of the network has been assigned a Medium level of sensitivity in terms of road safety.”</i></p> <p>What is the basis for assigning a ‘Medium’ level of sensitivity here? Could the Applicant please expand providing references or evidence to support this?</p> <p>On a related point, Transport Assessment (ES Appendix 16-2) paragraph 4.4.28 states in part: <i>“It should however be noted that a low number of construction staff development trips (a peak of 143 construction worker vehicles travelling to/ from the Scheme per day) have been distributed through this junction along the A1500 to arrive at Principal Site Access 4.”</i></p> <p>Does this take into account the cumulative effects of other development and does the cumulative assessment at ES Chapter 18 [APP-049] assess the effect on collisions (and in particular; this junction)?</p>
Q1. 13.10	Applicant	<p>Construction Traffic</p> <p>The Applicant responded to Stow Parish Council’s concerns in relation to construction traffic on PDF pages 140 to 142 of its Responses to Relevant Representations [REP1-028]. Could the Applicant please elaborate on the extent to which the proposed construction traffic routing for the Proposed Development is the same as previously assessed by the SoS and relevant ExAs for other solar NSIPs in the local area? In doing so, could the Applicant please highlight where there are any differences proposed in relation to the Tillbridge Project in terms of construction traffic routing?</p>

ExQ1	Question to:	Question:
Q1. 13.11	LCC	<p>FCTMP</p> <p>Paragraph 9.11 of LCCs LIR [REP1A-001] states in part: <i>“The Framework Construction Traffic Management Plan (ES Vol 7) needs to be captured as a requirement rather than a stand alone document.”</i></p> <p>However, Requirement 14 of the draft DCO [APP-014] relates to the FCTMP [REP1-021]. Could the Council please confirm the acceptability or otherwise of this requirement/approach to securing the FCTMP?</p>
Q1. 13.12	WLDC	<p>FCTMP</p> <p>Paragraph 9.34 of WLDC’s LIR [REP1a-005] states in full: <i>“With regard to the mechanisms used to control construction traffic cumulatively with other projects however, WLDC has significant concerns regarding the lack of detail on how such impacts will be controlled.”</i></p> <p>Could the Council please elaborate on this statement and provide information to clarify which details it thinks should be provided in the FCTMP [REP1-021]?</p>
14. Water environment including flood risk		
Q1. 14.1	Applicant Environment Agency	<p>How will the waste water arising from the cleaning of the solar panels be collected, treated and disposed of? What potential risks are associated with the wastewater and its contamination? Ref: 6.1 Chapter 10 Water Environment [APP-041].</p>
Q1. 14.2	Applicant Environment Agency LLFA IDB	<p>The Applicant proposes that pluvial water falling on the developed site will behave the same as that falling upon green field with similar infiltration rates and run off. Is there any evidence to demonstrate the impermeability of solar panels and the concentration of the rainfall run off at their lower edges behaves the same way as per natural distribution of rainfall? What is the impact on time to peak curves for rainfall concentrated into this way as opposed to more open infiltration? Ref: 6.2 Appendix 10-3 Flood Risk Assessment [APP-097].</p>
Q1. 14.3	Applicant LCC FRS	<p>Storage of water for firefighting is proposed to meet the requirements of the NFFC guidance but is there an additional allowance for storage for the integral firefighting and sprinkler systems proposed for the BESS or does this eat into the fire fighters allowance and is there a risk that the supply for attending fire fighters is partially used or exhausted by the time of their arrival?</p>

ExQ1: 19 November 2024

Responses due by Deadline 3: Tuesday 10 December 2024

ExQ1	Question to:	Question:
		Ref: 6.1 Chapter 10 Water Environment [APP-041].
Q1. 14.4	Applicant Environment Agency LLFA IDB	A section of watercourse is proposed to be fenced across. What measures are proposed to prevent debris build up, damming and associated risk during a flood event and what are the EA/IDB/LLFA views on the crossing and obstruction of this watercourse? Ref: 6.2 Appendix 10-3 Flood Risk Assessment [APP-097].
Q1. 14.5	Environment Agency LLFA IDB	What are the EA/IDB/LLFA views on the freeboard for the solar panels in the interaction area reducing to 220mm at the end of the life of the development, and are they happy that adequate assessment of the risks of climate change have been accommodated into the FRA? Ref: 6.2 Appendix 10-3 Flood Risk Assessment [APP-097].
Q1. 14.6	Applicant Environment Agency	What is the purpose of the reservoirs within and adjacent to the order limits? Are they to be retained, maintained by who and what is the residual risk from these reservoirs in relation to the development? Ref: 6.3 Fig 10-1 Surface Water Features and their Attributes [APP-167].
Q1. 14.7	Applicant Environment Agency	What is the vulnerability of the HDD connections and working pit locations to fluvial alignment changes in Ref: 6.2 Appendix 10-3 Flood Risk Assessment the River Trent in the future should the river meander?
Q1. 14.8	Applicant	What is the proposed construction and permeability of the permanent access roads to ensure their surface water drainage discharge is less than or equal to greenfield run off rates? Ref: 6.2 Appendix 10-3 Flood Risk Assessment [APP-097].
Q1. 14.9	Applicant	Where areas of solar panels coincide with areas at highest risk of flooding, can the Applicant confirm how the design and layout of solar panels has been addressed to minimise risk of flooding? For example, how will the bottom level of solar panels in areas at risk of flooding, set out in ES Chapter 10, paragraph 10.4.18 [APP-041], be secured?
Q1. 14.10	Applicant	Paragraph 10.7.35 [APP-041] and Environment Agency [RR-093] notes that another construction compound is to be installed in flood zone 3 but would be temporary so is not mitigated. How will flood risk in this area be managed and measures secured?

ExQ1	Question to:	Question:
15. Other planning matters		
Q1.15.1	LCC	<p>Glentworth K Oil Site</p> <p>Paragraphs 12.6 and 12.7 of the Council's LIR [REP1A-001] refer to the effect of the Proposed Development on the operation of the Glentworth K Oil site. Please could the Council confirm its current position on the effect on this site, with reference to relevant policies?</p>
Air quality		
Q1.15.2	Applicant	<p>Non-Road Mobile Machinery</p> <p>ES paragraph 6.4.23 [APP-037] outlines that emissions from Non-Road Mobile Machinery (NRMM) have not been modelled separately. Part of the reason given is that they are already included in the Institute of Air Quality Management assessment approach. Could the Applicant please expand on this point? In particular, is the use of NRMM for construction of the cable route accounted for by this approach?</p>
Q1.15.3	Applicant	<p>Cumulative effects</p> <p>Could the Applicant direct the ExA to the assumptions/ methodology which underpins the approach taken to the assessment of cumulative effects on air quality in the Air Quality Modelling Report [APP-056] (for example, which projects have been included and what are the assumed/ worst-case construction scenarios used in this assessment)?</p>
Q1.15.4	Applicant	<p>Unplanned emissions</p> <p>What is the Applicant's view on whether the conclusions reached in ES Appendix 17-5 [APP-123] should be referred to and considered in the Air Quality Chapter of the ES? What implications, if any, do these conclusions have with regard to the assessment undertaken in the Air Quality Chapter?</p>
Minerals and waste		
Q1.15.5	LCC	<p>Waste Topic Paper</p> <p>Could LCC please provide a response to the 'Applicant's Responses to Relevant Representations' [REP1-028] in relation to 'waste' at PDF pages 86-89 and the Waste Quantitative Cumulative Assessment at Appendix A?</p>

ExQ1: 19 November 2024

Responses due by Deadline 3: Tuesday 10 December 2024

ExQ1	Question to:	Question:
Q1. 15.6	WLDC	<p>Minerals and Waste</p> <p>Could WLDC please expand on the conclusions at paragraph 18.1 (W2 and W3) of its LIR [REP1A-005], particularly given that these conclusions do not appear to be expanded on in the text in Section 18 of the LIR.</p>
Q1. 15.7	NCC	<p>Minerals safeguarding</p> <p>Could the Council please confirm whether it considers that the Proposed Development complies with Nottinghamshire Minerals Local Plan (2021) Policy SP7? This policy is referred to at paragraphs 5.8 to 5.10 of NCCs LIR [REP1A-002] but it is not clear whether the Council considers the Proposed Development to comply with this policy.</p>
Ground conditions		
Q1. 15.8	Applicant	<p>Ground Conditions</p> <p>ES Appendix 17-4 [APP-122] (Preliminary Risk Assessment (PRA) for the cable route corridor) notes several limitations due to access constraints and contains recommendations for further work. Please explain what has been done to address the recommendations for further work within this document. Can the Applicant confirm when further work will be undertaken and how it would be secured?</p>
Other		
Q1. 15.9	WLDC	<p>PoC</p> <p>Paragraph 6.28 of WLDCs Written Representation [RE2-016] states in part <i>“...whilst connection agreements are in place, what has not been confirmed in the application documents is whether there is existing capacity at the PoC to connect all of the projects, or the implications for all developments seeking to make connections within a similar timeframe.”</i> Could WLDC please specify what effect is alleged here, if any?</p>