

**Application by Tillbridge Solar Project Limited for an Order Granting Development Consent for Tillbridge Solar Project
The Examining Authority's first written questions and requests for information (ExQ1)
Issued on 19th November 2024**

WEST LINDSEY DISTRICT COUNCIL

Answers to Examining Authority's Questions (ExQ1)

Tillbridge Solar Project (EN010142)

Deadline 3

Date: 10th December 2024

Preamble:

This document provides the response of West Lindsey District Council (WLDC) to the Examining Authority's questions.

Abbreviations used:

AP	Affected Person	ES	Environmental Statement
Art	Article	EqIA	Equality Impact Assessment
ALA 1981	Acquisition of Land Act 1981	ExA	Examining authority
ALC	Agricultural Land Classification	ha	Hectare
BDC	Bassetlaw District Council	HSE	Health and Safety Executive
BMV	Best and Most Versatile land	HDD	Horizontal Directional Drilling
BoR	Book of Reference	IAQM	Institute of Air Quality Management
BESS	Battery Energy Storage System	IDB	Internal Drainage Board
CA	Compulsory Acquisition	IEMA	Institute of Environmental Management Association
CCG	Clinical Commissioning Group	IP	Interested Party
CDMP	Construction Dust Management Plan	LA	Local authority
CEMP	Construction Environmental Management Plan	LIA	Local Impact Area
CTMP	Construction Traffic Management Plan	LVIA	Landscape and Visual Impact Assessment
CLLP	Central Lincolnshire Local Plan	LCC	Lincolnshire County Council
CPO	Compulsory purchase order	LIR	Local Impact Report
DAS	Design and Access Statement	MP	Model Provision (in the MP Order)
dDCO	Draft DCO	MP Order	The Infrastructure Planning (Model Provisions) Order 2009
dNPS	Draft National Policy Statement	MWh	MegaWatt Hour
dML	Deemed Marine Licence	NE	Natural England
EM	Explanatory Memorandum	NPPF	National Planning Policy Framework
EMF	Electro Magnetic Field	NCC	Nottinghamshire County Council
ERP	Emergency Response Plan	NPS	National Policy Statement

NSIP	Nationally Significant Infrastructure Project	SI	Statutory Instrument
OBSSMP	Outline Battery Storage Safety Management Plan	SoR	Statement of Reasons
OCEMP	Outline Construction Environmental Management Plan	SoS	Secretary of State
OEMP	Operational Environmental Management Plan	STEP	Spherical Tokamak for Energy Production fusion project
OLEMP	Outline Landscape and Ecological Management Plan	TP	Temporary Possession
OSMP	Outline Soil Management Plan	UKAEA	The UK Atomic Energy Authority
OPROWMP	Outline Public Right of Way Management Plan	USI	Unaccompanied Site Inspection
PA2008	The Planning Act 2008	UKHSA	United Kingdom Health Security Agency
PEIR	Preliminary Environmental Impact Report	WLDC	West Lindsay District Council
PPG	Planning Practice Guidance	WR	Written Representation
PROW	Public Right of Way	WSI	Written Scheme of Investigation
RR	Relevant Representation	ZTV	Zone of Theoretical Visibility

EXQ1	Question to	Question	WLDC Response
1. General and cross-topic questions			
General and cross-topic questions			
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>	<p>WLDC attach, as Appendix A to this submission, a table setting out the key planning impacts which also form the principal differences of opinion between the applicant and WLDC.</p> <p>To provide clarification, the LIR reports the impacts of the proposal as WLDC views them. This is based upon the ES conclusions, other supporting documents and the opinion of WLDC.</p> <p>In general terms, WLDC does not raise material objections to the EIA methodology, the manner in which assessments have been carried out or the judgements reached as reported in the ES.</p> <p>Where WLDC differs from the applicant, is the planning judgments reached when applying the impacts reported in the ES to the relevant policy framework. WLDC's concerns therefore relate to a planning policy assessment as opposed to any fundamental criticism of the EIA or other application documents (all of which are considered equally important to WLDC).</p> <p>The table provided sets out the topic area, the matter of concern/objection and to which phase of the development those impacts relate.</p> <p>WLDC can confirm that the table has been shared and discussed with the applicant in draft form, and its content has been included in the recent draft of the Statement of Common Ground between the parties.</p>

EXQ1	Question to	Question	WLDC Response																																																																																																												
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>	<p>WLDC's concerns around the potential cumulative construction period is derived from the lifespan of the DCOs that have been granted or sought, and the estimated construction periods cited in the respective project ESs.</p> <p>The DCO lifespan being sought for projects is 5 years and the estimated construction period is 24 months, aside from the Gate Burton Energy Park which cites a period of 24-36 months.</p> <p>Based upon these parameters for the 4 NSIPs either consented, at decision stage or in examination, plus the 5th NSIP due to be submitted shortly, a simple 'staggering' of development periods within the 5 year periods for each consents could lead to construction activity occurring up to 2033. There is no control over the commencement of construction aside from that it must do so within 5 years of the Orders coming into force.</p> <p>The table below helps demonstrate this potential scenario.</p> <p>WEST LINDSEY DISTRICT COUNCIL NSIP SOLAR FARMS POTENTIAL PROGNOSIS OF CONSTRUCTION <i>*24 month construction period assumption</i></p> <p>Key: DCO granted Expected decision date Decision estimated Construction period</p> <table border="1" data-bbox="913 997 1834 1129"> <thead> <tr> <th rowspan="2">PROJECT</th> <th rowspan="2">DCO into force</th> <th rowspan="2">Est. Construction period (longest)</th> <th colspan="13">YEAR</th> </tr> <tr> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> <th>2029</th> <th>2030</th> <th>2031</th> <th>2032</th> <th>2033</th> <th>2034</th> <th>2035</th> </tr> </thead> <tbody> <tr> <td>Gate Burton Energy Park</td> <td>Aug-24</td> <td>36 months</td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> </tr> <tr> <td>Cottam Solar Project</td> <td>Sep-24</td> <td>24 months</td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> </tr> <tr> <td>West Burton Solar Project</td> <td>Jan-25</td> <td>24 months</td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> </tr> <tr> <td>Tillbridge Solar Project</td> <td>Oct-25</td> <td>24 months</td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> </tr> <tr> <td>One Earth Solar Farm</td> <td>Dec-26</td> <td>24 months</td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> <td style="background-color: #90EE90;"></td> </tr> </tbody> </table> <p>To confirm, WLDC does not object to the cumulative assessment in the Tillbridge ES. This impact raised is simply highlighted a scenario that has the potential to happen within the scope of the DCOs being made.</p> <p>WLDC consider this period to be a significant length of time for residents to endure, and highlight the impact as one that should be considered negatively in the planning balance.</p>	PROJECT	DCO into force	Est. Construction period (longest)	YEAR													2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Gate Burton Energy Park	Aug-24	36 months														Cottam Solar Project	Sep-24	24 months														West Burton Solar Project	Jan-25	24 months														Tillbridge Solar Project	Oct-25	24 months														One Earth Solar Farm	Dec-26	24 months													
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<p>Q1. 1.10</p>	<p>WLDC</p>	<p>Planning balance 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>	<p>Section 104 of the PA2008 requires that an application must comply with a relevant NPS and that they must be decided in accordance with them unless, <i>inter alia</i>, the adverse impact of the proposed development outweighs its benefit.</p> <p>The impacts of the Tillbridge Solar Project must therefore firstly satisfy the NPS and, if so, a balance of its adverse impacts with its benefits must then be carried out.</p> <p>NPS EN-1 paragraph 4.1.7 relates to a section providing policy on 'weighing impacts and benefits'. It states that '<i>where an NPS requires an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such measure, the Secretary of State should weigh those residual effects against the benefits of the proposed development.</i>'</p> <p>It further states that, for projects that qualify as CNP infrastructure, it is likely that the need case will outweigh the residual effects in all but the 'most exceptional' cases.</p> <p>With regard to the cumulative impact of the Tillbridge Solar Project with the other three solar NSIP projects either consented or awaiting decision, WLDC considers these impacts to be 'exceptional'. The magnitude of landscape character change for a period of 60 years is significant and adverse in planning policy terms.</p> <p>The consideration of four large scale solar NSIP applications within the same rural district, covering an area of approximately 2795ha / 27.9km² with panels and BESS is unprecedented. There is no other example of a decision made under the PA2008 that is comparable. WLDC is not aware of any other NSIP that has been tested against NPSs EN-1 and EN-3 with regard to the magnitude of cumulative impacts as will be required in the determination of the Tillbridge Solar Project.</p> <p>WLDC therefore considers paragraph 4.1.7 (and the section of NPS EN-1 to which it relates) to reflect precisely the manner in which application must be determined. It confirms that how the balancing of impacts and benefits should be carried to establish compliance and non-compliance with section 104 of the PA2008. Paragraph 4.1.7 is helpful in reminding decision makers that, notwithstanding the positive policy balance towards the need for energy impacts and their inherent impacts in themselves, there is a need to give appropriate weight to residual impacts in exceptional circumstances.</p> <p>As stated above, the situation affecting the West Lindsey District is unprecedented and unique. This gives rise to level of cumulative impacts that are 'exceptional', imposing such a magnitude</p>
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EXQ1	Question to	Question	WLDC Response
			<p>of change to a rural agricultural landscape character and visual effects baseline, that such disbenefits outweigh the benefits.</p> <p>In terms of considering the acceptability of the project against planning policy, the impacts identified are taken directly from the applicant's ES and other supporting documents. WLDC's objection to the application is based upon the application of all of the supporting documents (of which the ES is one) against the policy framework.</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>	<p>WLDC's understanding is that the Nationally Significant Infrastructure Projects: Advice on Good Design (23/10/2024) is non-statutory, but applicants are advised to follow the recommendations. The Advice has been published to compliment legislation, regulations and other guidance published by the government (under section 51 of the Planning Act 2008).</p> <p>WLDC's view is that accordance with the Advice is integral to demonstrating compliance with legislation, regulations and relevant NPSs.</p> <p>The Advice itself can also be considered an 'important and relevant matter' in to the context of section 104 of the Planning Act 2008.</p> <p>WLDC is aware that the four high-level principles expressed within the National Infrastructure Commission 'Design Principles for National Infrastructure' document are referenced in the applicant's Design and Access Statement, but have not seen reference elsewhere (e.g. within the ES).</p>
Habitats Regulations Assessment (HRA)			
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</p>	<p>WLDC has no comments to make regarding Habitats Regulations Assessment or the construction parameters for the cable under the River Trent.</p>

EXQ1	Question to	Question	WLDC Response
		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?	
7. Heritage			
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>	<p>WLDC has not raised an objection to the scheme with regards to impacts on the Corringham Windmill cultural heritage asset or its setting.</p> <p>Having reviewed the ES, WLDC's view is that the setting of the Corringham Windmill would be wider than just the field within which it is situated. Defining settings in such a precise or confined manner is not normally helpful or appropriate in assessing impacts. In this case, the Windmill would relate to the wider landscape within which it is interpreted. Notwithstanding the above view however, WLDC agrees with the impacts assessed in the ES. Even if a slightly wider setting were applied to the assessment, WLDC does not consider that it would materially alter the conclusions reached.</p>
9. Landscape and visual impact			

EXQ1	Question to	Question	WLDC Response
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>	<p>In accordance with the requirements of the Planning Act 2008 and the government's Guidance 'Nationally Significant Infrastructure Projects: Advice for Local Authorities', WLDC have produced and submitted an LIR that provides the details of the likely impacts of the Tillbridge Solar Project on the West Lindsey District.</p> <p>The LIR is therefore a statement of impacts that are considered important to WLDC, which have been identified to bring them to the attention of the Examining Authority and the Secretary of State. The LIR is not a document that provides a balancing exercise or attributes weight to them; its role is to identify them.</p> <p>The identification of the impacts set out in the LIR have been formed based on a review of the application material by Officers, culminating in the resolution to approve the LIR by Councillors incorporating any additional impacts that they wished to include. WLDC have therefore made the Examining Authority aware of the potential impacts in its LIR based upon local knowledge and technical evaluation as required by government guidance.</p> <p>No further assessments for specific topics have been carried out by WLDC. As set out in government guidance, WLDC considers that the role of an LPA is to evaluate the assessments carried by the applicant and provide their views upon it. The evaluation, judgements and identification of impacts are based upon professional judgement, local knowledge and the views of elected Councillors.</p>

EXQ1	Question to	Question	WLDC Response
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>	<p>The term ‘abortive implementation’ was used to describe a situation where a restoration scheme associated with cable construction in the shared corridor, is affected by the construction works of a later project constructing their cable in the same area.</p> <p>WLDC’s concern relates to the construction sequence of the projects cumulatively. Each project is able to construct at whatever stage it wishes in the construction period (as long as the project construction has commenced within the 5 year consent lifespan). In relation to the shared cable corridor, each project has the same order limits allowing them to construct anywhere within the defined area.</p> <p>This results in the potential for a project to construct and carry out restoration, only for the next project to then commence construction and affect that restoration.</p> <p>Should this situation occur, implemented restoration schemes for each project could be disturbed and their success compromised. The situation could also create difficulties in enforcement, as the lack of co-ordination between projects could prevent swift identification of parties responsible and those who remedy should be sought.</p> <p>Had the developers entered into a binding and enforceable mechanism to require co-ordination, this situation would not be such a concern for WLDC.</p>

<p>Q1. 11.14</p>	<p>WLDC and Applicant</p>	<p>Tourism 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 to be impacted through the influx of workers employed on a number of projects over a significant period of time (up to a decade).”</i> 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>	<p>WLDC considers that there is potential for the proposal to have a negative impact upon the tourism economy within the West Lindsey District.</p> <p>The applicant’s ES assesses the impacts of construction workers, adopting a study area of a 60 minute travel time from the site. WLDC does not object to the study area.</p> <p>WLDC’s concern relates to potential cumulative impact of the Tillbridge Solar Project and the other solar developments within the district with regard to the use of tourist accommodation in the West Lindsey District to accommodate construction workers. The ES does not provide any assessment of the likely impact specifically within the West District; it only assesses capacity within the much wider 60 minute study area.</p> <p>If the cumulative impacts result in much of the accommodation available within West Lindsey being used to accommodate construction workers, WLDC has concerns that this would have an adverse impact upon the tourism sector. Should there be a significant reduction in the availability of accommodation for tourists, it can be assumed that visitors will look elsewhere beyond the District. Due to the potential lengthy cumulative construction period of a number of years, the ability for tourist accommodation businesses to recover once construction is complete is unknown and it is feared it would take significant time to do so. As set out in the LIR and WR, the tourist industry is already seeking to re-establish growth post-COVID, and eliminating accommodation for visitors could prolong this recovery.</p> <p>WLDC notes that the applicant states that the influx of workers to be positive to the tourism sector, however this does not appear to take account of the wider linked-industry benefits that tourism has. In visiting an area, tourists will naturally visit attractions in the area and spend within other hospitality and leisure facilities during their stay.</p> <p>As the ES or any other application document does not provide data specifically for the West Lindsey District, it is not possible to provide make a judgement in EIA terms or policy terms. Noting the methodology adopted by the applicant in the ES, ‘adverse’ classification indicates a ‘disadvantageous or adverse effect on an area, which may be minor, moderate or major in effect’. The period of effect is also taken into account and calibrated as ‘medium term’ = 1-5 years and ‘long term’ = more than 5 years.</p> <p>Should the cumulative impact upon the availability of tourist accommodation for visitors be significantly reduced, and the cumulative construction period enduring for longer than 5 years, it may be concluded that such effects could be adverse and long term. This assessment could be</p>
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EXQ1	Question	Question	WLDC Response
			carried out if the specific tourist accommodation data for the West Lindsey District can be provided.
13. Transport and access			

<p>Q1. 13.12</p>	<p>WLDC</p>	<p>FCTMP 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> 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>	<p>WLDC have, from the first solar NSIP examination within the district, wished to see a truly co-ordinated approach from the developers that is binding and enforceable. The reasoning behind this is there is currently no obligation through Development Consent Orders, to oblige developers to construct their respective projects in a collaborative and co-ordinated manner. The overlapping and concurrent construction activities will in WLDC's view, cause significant impacts in terms of construction traffic and the ability of communities and visitors to travel through the district. These impacts will be experienced over a number of years.</p> <p>WLDC note the Joint Report on Interrelationships between NSIP projects produced by the applicant and other developers. Unfortunately, this document does not serve to exert any control over joint activities to minimise impacts. The commitments within the document are not firmly made and neither is the document secured through a DCO 'requirement'.</p> <p>This leaves the Framework Traffic Management Plan as the mechanism to control construction traffic. WLDC has suggested at each NSIP examination that a designated, single co-ordinator be established to independently manage construction traffic. They would be a point of reference for the LPAs, which would assist with monitoring and enforcement as they would hold knowledge of movements on any particular day.</p> <p>As Tillbridge represents the fourth solar project being considered on a cumulative basis, there is a clear need to control these impacts. The structure below provides WLDC's view on what a co-ordinated document could comprise. Had all applicants engaged and committed to genuinely minimise impacts on communities, a joint approach could have readily been achieved.</p> <p>Scope and objectives of the plan Explains the scope, purpose and objective of the plan, to include:</p> <ul style="list-style-type: none"> • The management of all freight traffic associated with two or more projects – heavy goods vehicles (HGVs), light goods vehicles (LGVs) and abnormal indivisible loads (AiLs) • The purpose is to prioritise the safe, efficient delivery of strategic cumulative (impacts associated with two or more solar generating station projects within West Lindsey District) construction traffic, whilst minimising delay to the travelling public and amenity impact on local communities. • Approach to reporting and public awareness (see below) <p>Construction traffic routes</p>
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			<ul style="list-style-type: none"> • The identification of the defined construction traffic routes, as assessed in the project specific Environmental Statement, including the routes to be used by more than one solar generating station project during construction • An explanation of the appropriateness of the routes selected <p>Abnormal indivisible loads</p> <ul style="list-style-type: none"> • To provide the details of quantum of AiL movements required and the cargo • To confirm details of the AiL routes • Confirm any lay-down areas • Convoy sizes <p>Traffic management</p> <ul style="list-style-type: none"> • Define the strategy for the delivery of construction traffic to serve more than one solar generating station project <p>Delivery times</p> <ul style="list-style-type: none"> • Define the appropriate cumulative construction traffic delivery times for each project • Confirm time when AiL trips are to occur (e.g. during daylight hours) <p>Public awareness</p> <ul style="list-style-type: none"> • Production of a co-ordinated public awareness strategy for more than one project. • Designation of a single co-ordinator to manage construction traffic for each project. To be responsible for: <ul style="list-style-type: none"> - Liaising with each development project - Responsible for forward planning of activities and trips, and associated records for LPAs/stakeholders - Responsible for dissemination of information (Websites/social media/emails etc) to the community ahead of cumulative activities - Notification of any potential delays on local roads <p>Highway improvements</p> <ul style="list-style-type: none"> • Description of highway improvements required to facilitate delivery of construction component and general traffic • Identification of cumulative locations for improvement. <p>Structures</p>
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EXQ1	Question to	Question	WLDC Response
			<ul style="list-style-type: none"> • Details of the assessment of all structures that may be subject to the gross vehicle weight of abnormal loads. • Identification of any strengthening measures required. • Identification of listed structures that may be affected. • Identification of any condition surveys required. <p>Environmental impacts</p> <ul style="list-style-type: none"> • Confirmation that cumulative traffic movements will be within the scope of the assessed EIAs • Confirmation/signposting of the relevant mitigation or each project <p>Monitoring, reporting and review</p> <ul style="list-style-type: none"> • Explanation of the approach to the monitoring, reporting, and review of cumulative construction traffic
15. Other planning matters			
Minerals and waste			

EXQ1	Question to	Question	WLDC Response
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>	<p>The impacts identified at 18.1 in WLDC's LIR relates to the likely potential impacts that could occur from the waste and recycling of infrastructure components replaced under the broad 'maintenance' clause in the dDCO. These concerns are also set out in WLDC's WR at 5.35-5.42.</p> <p>The concern relates to the approach to 'maintenance' as a power conferred by the draft order. The Tillbridge Solar Project (individually and cumulatively with other NSIP solar projects) have the ability to replace panels on a piecemeal basis across the 60 year lifetime of the project. Whilst keeping below the EIA thresholds for an individual replacement 'event' these can be repeated throughout the whole application lifespan.</p> <p>WLDC's understanding is that panels could require replacement from approximately 20 years of use, and the BESS will also require a full replacement. It is also understood that there is insufficient capacity in West Lindsey, Lincolnshire or even the UK to recycle this material at the current time.</p> <p>The application documents do not provide any clarity on how replaced infrastructure will be dealt with. In the absence of any information relating to what recycling facilities may be delivered in the future, WLDC would welcome clarity on what the approach would be against the existing baseline.</p> <p>As all of the cumulative solar NSIPs are able to replace substantial amounts of solar panels and the BESS without any control or understanding of the potential impacts, WLDC maintain a significant concern that such activities could give rise to adverse environmental impacts, and impacts on communities.</p>
Other			

EXQ1	Question to	Question	WLDC Response
Q1. 15.9	WLDC	<p>PoC Paragraph 6.28 of WLDCs Written Representation [RE2-016] states in part</p> <p><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></p> <p>Could WLDC please specify what effect is alleged here, if any?</p>	<p>WLDC’s question seeks clarification on whether, as a consequence of the Tillbridge Solar Project in solus or cumulatively with other solar NSIPS, there is a need for new infrastructure (development) at the Point of Connection triggered by the solar farm projects.</p> <p>This question is asked to ensure that no further development will be required to connect the projects, which may also give rise to environmental impacts.</p> <p>WLDC understands that it is not the responsibility of the applicant to ensure the connection of their project to the National Grid, however it appears that there is no information on this matter within the application documents.</p>