

APPENDIX A

WLDC RESPONSE TO EXAMINING AUTHORITY'S QUESTIONS (ExQ1) TILLBRIDGE SOLAR PROJECT

Question 1.1.5 - Summary Table of Key Planning Impacts

TOPIC	KEY PLANNING IMPACT	PHASE
Landscape and Visual Amenity	WLDC consider that the sensitivity attributed to residents (people) should be higher. Based upon the assessment methodology, this does not materially affect the assessment outcomes in the Environmental Statement, but should be recognised in the planning balance.	Operation
Landscape and Visual Amenity	The proposal will have significant adverse impacts upon 'The Cliff' Landscape Character Area, failing to the conserve and enhance its qualities, character and distinctiveness. The proposal fails to minimise adverse visual impacts through high quality landscape design, and does not adequately demonstrate how the Scheme has responded positively to the landscape character.	Operation
Landscape and Visual Amenity	<p>The cumulative impacts of the proposal with other solar electricity generating station projects upon landscape character, visual effects and amenity will be significant and adverse. WLDC consider the impacts to be contrary to national and local statutory planning policies, and the proposal should be refused development consent for such reasons.</p> <p>WLDC consider that unacceptable cumulative impacts will be experienced with Tillbridge Solar Project being added to the impacts caused by the consented Gate Burton Energy Park and Cottam Solar Project. Such impacts would be further exacerbated should the West Burton Solar Project receive consent.</p>	Construction Operation Decommissioning
Landscape and Visual Amenity	<p>The site design process has resulted in associated development (substation and BESS infrastructure) being located at prominent locations within the site closest to The Cliff AGLV. This results in these components contributing to a significant impact upon the most sensitive landscape within and adjacent to the Principal Site.</p> <p>WLDC does not understand why the design process has not mitigated this impact by locating such infrastructure in a manner that would minimise adverse impacts on the most sensitive landscape.</p>	Operation

	The impact of the Associated Development is exacerbated due to the scheme design resulting in such infrastructure being scattered throughout the development site in prominent locations. WLDC does not understand why such infrastructure could not be located together in a single location within the site away from sensitive receptors.	
Landscape and Visual Amenity	WLDC considers that the proposal fails to protect views from the village of Glentworth, as specified in the Glentworth Neighbourhood Plan, which contribute to the valued character of the Spring Line Village.	Construction Operation Decommissioning
Ecology and Nature Conservation	Whilst WLDC agree that the study area is clearly set out on the assessment, most of the surveys appear to cease at the site boundary. WLDC would normally expect them to extend beyond the site boundary in order to fully understand the ecological baseline.	Construction
Ecology and Nature Conservation	WLDC would welcome clarification and justification on how the conclusion of 'minor benefit' to species such as golden plover and skylark have been reached. WLDC understand that such species require open habitats and the proposal would seem to have a negative impact in that regard.	Construction Operation
Ecology and Nature Conservation	It appears to WLDC that no tree or structure surveys for bat roosts were undertaken. The assessment states that all roosts and potential roost features identified are outside the current footprint of the Scheme, and will therefore not be impacted. However, the plans show suitable features (trees and woodland blocks) within the site boundary and it is unclear why potential roosts are therefore considered to be outside the zone of influence of the works.	Construction Operation
Ecology and Nature Conservation	It is not clear to WLDC if otter and water vole surveys were undertaken outside of the site boundary. WLDC understands that a failure to do this would not be compliant with current guidance and would welcome clarification on this matter.	Construction Operation
Ecology and Nature Conservation	Whilst WLDC acknowledges that the Construction Environmental Management Plan (CEMP) sets out measures to deal with the risk of encountering great crested newts, it does not appear to detail the approach to be taken if they are encountered.	Construction
Ecology and Nature Conservation	WLDC noted that the Environmental Statement states that there may be indirect impacts to bats, but that these would be avoided through precautionary working method statements. WLDC is	Construction Operation

	<p>concerned, however, that no presence/absence surveys of structures/trees have been undertaken to determine if roosts are present and, if so, what their type and size are.</p> <p>It is also stated that a 15m buffer would be placed around all potential roosts to avoid impacts. In the absence of such survey data, WLDC would welcome clarification how that buffer distance can be determined with sufficient confidence.</p>	
Ecology and Nature Conservation	WLDC have concerns regarding the combined cumulative impact associated with the construction, operation and decommissioning of this and other DCO solar schemes on ecology and biodiversity.	Construction Operation Decommissioning
Ecology and Nature Conservation	<p>WLDC have significant concerns regarding the lack of a co-ordinated approach to construction and restoration activity within the shared cable corridor. As each DCO is being made on its own terms to serve the project to which they relate, and due to the lack of commitment from developers to co-ordinate construction activity (either through a document secured as a 'requirement' or legal agreement), all developers will be able to implement their project without having any regard to restoration that may have taken place in connection with a project constructed before them.</p> <p>Aside from the unnecessary impact on restoration programmes, the enforcement process to determine what requires further restoration/maintenance, and which party is responsible for this, will be very difficult to establish.</p>	Construction Operation
Socio-economics and Land Use	<p>WLDC considers that there will be a long-term impact on tourism as a result of the Scheme during the construction phase.</p> <p>The influx of construction workers will materially decrease the availability of tourist accommodation, which will be further exacerbated on a cumulative basis with other DCO solar projects within West Lindsey.</p> <p>The significant reduction in the availability of tourist accommodation will, in WLDC's view, result in visitors seeking accommodation in different parts of the region, which will have a direct and indirect effect on tourism in the district.</p> <p>Once the construction period for all projects is complete (which will occur for a number of years), there is no certainty that the tourism sector will recover to its former level and, if so, how long this would take.</p>	Operation

	None of these economic impacts have been assessed as part of the application.	
Socio-economics and Land Use	WLDC is unable to source an assessment of the loss of agricultural land to the agricultural sector. Such an assessment would include the potential loss of employment over the operational period of the Scheme.	Operation
Socio-economics and Land Use	WLDC notes that there is the potential for a fire event to occur at any location within the development site during all phases of the project. This risk must be weighed negatively in the planning balance, notwithstanding the measures set out in the Outline Battery Storage Safety Management Plan.	Construction Operation Decommissioning
Socio-economics and Land Use	The loss of agricultural land for food production represents a significant adverse impact. This impact is exacerbated by the cumulative effects of the loss of this type of land with other large scale solar NSIPs located within the West Lindsey District.	Construction Operation
Transport and Access	WLDC is unable to identify any data regarding potentially sensitive receptors in the Study Area. This includes clarification as to where the current baseline driver delay has been included in the analysis.	Construction Operation Decommissioning
Transport and Access	WLDC would welcome clarification on the approach to obtaining and reporting baseline data for pedestrians and cyclists. It appears to WLDC that there is a lack of such baseline data, which would enable an understanding of the impacts of severance, delay and amenity to non-motorised highway users. Such impacts have the potential to occur across all phases of the project, factoring in potential traffic impacts that may occur during the replacement of panels and other infrastructure throughout the life of the project.	Construction Operation Decommissioning
Transport and Access	Clarification is required to confirm the application of the IEMA guidance to giving 'special consideration' to non-motorised users with regard to fear and intimidation.	Construction Operation Decommissioning

Transport and Access	With regards to the Outline Construction Traffic Management Plan (OEMP), WLDC wishes for the applicant to provide the measures to be adopted in the event two or more projects are being constructed simultaneously. The approach should then be replicated in the control document for each cumulative project to enable communities to understand the traffic related activities in the area, and how developers have sought to minimise impacts during the construction phase.	Construction
Transport and Access	WLDC seeks clarification on whether there is scope for further mitigation to minimise impacts at the B1241 (ATC 23) located close to a Primary School (assessed as 'moderate adverse (significant)).	Construction
Transport and Access	<p>WLDC objects to the application due to the combined cumulative impact of traffic and transport associated with the construction, operation and decommissioning of the schemes.</p> <p>The objection relates to the potential period of exposure to impacts that local communities may experience, and the un-coordinated approach between the projects with regard to construction activity.</p> <p>All consented projects are able to construct at any stage and for as long a period as they wish under the scope of the respective Development Consent Orders.</p> <p>The potential cumulative construction traffic could give rise to significant disruption to local communities, requiring significant traffic management and causing delays to journeys over a number of years.</p>	Construction
Soils and Agriculture	WLDC would welcome clarification on the approach to soil surveys in the Cable Route Corridor. It appears to WLDC that the Corridor has not been subject to a soil survey.	Construction Operation Decommissioning
Soils and Agriculture	The assessment of the effects on farming circumstances is unsatisfactory to WLDC as there is insufficient baseline information for a detailed assessment to be made, and an established methodology has not been used.	Construction Operation Decommissioning
Soils and Agriculture	It is not clear why information from certain farm businesses affected by the Scheme have not been included in the assessment.	Construction Operation Decommissioning

Soils and Agriculture	WLDC would welcome further details to explain how the study areas have been defined, including an explanation of the rationale that informed the identification of the off-site buffer.	Construction Operation Decommissioning
Soils and Agriculture	WLDC considers the cumulative assessment in relation to soils to be very high level, and lacking detailed assessment of the likely impacts. Clarification on the weight given to the assumption that other projects will operate to a similar level of good practice would be welcome in determining residual impacts.	Construction Operation
Climate Change	WLDC would welcome clarification on the extent to which temporal effects have informed the assessment. This relates how market uncertainty, technological development and asset degradation is assumed and factored into the assessment. This matter also includes consideration of the design assumption on the project lifecycle.	Construction Operation Decommissioning
Climate Change	It is not clear to WLDC how the replacement of infrastructure (project components) has been accounted for in the assessment. The assessment does not justify or reason the degradation rates or whether degradation could be accelerated by climate change. Being unable to identify the likely failure rate of panels and the requirement to replace BESS and substation infrastructure during the lifespan of the consent, leaves the potential likely impacts during the operational phase unclear. As the DCO confers wide maintenance powers, WLDC has significant concerns about the extent of the project that could be 'replaced' without the impacts being assessed as part of the application, and without any control mechanisms imposed as part of the DCO.	Construction
Climate Change	WLDC considers that more information is required as part of the decommissioning risk assessment. This relates to an apparent lack of assessment of the likelihood and consequences of impacts that will change with the baseline (e.g. warmer winters and wetter summers).	Decommissioning
Climate Change	It appears that no decarbonisation rate is applied for greenhouse gas (GHG) emissions that would occur as a result of low-carbon electricity from the scheme replacing electricity generated by natural gas-fuelled CCGT.	Operation
Climate Change	The residual impact summary, Table 7-21, does not appear to include a summary for the CCR and ICCI assessment. It seems to simply cross reference back to the main assessment (e.g.	Construction Operation

	<p>identifying that no significant residual impacts were identified, the number of low significant impacts, and including the residual consequences of these).</p> <p>WLDC would welcome clarification on why the table has been presented in this manner.</p>	Decommissioning
Noise and Vibration	<p>WLDC consider that cumulative noise impacts during construction require a firm and enforceable commitment to joint working between developers to minimise impacts.</p> <p>The current Joint Report on Interrelationships does not deliver this commitment and leaves the potential impacts unmitigated and un-minimised.</p> <p>The failure of the respective projects to commit to delivering a joint and co-ordinated approach to construction, that can be enforced through a DCO 'requirement' or joint legal agreement, results in each project being able to construct solely on their own terms, without regard to minimising cumulative impacts on the environment or communities.</p>	Construction
Noise and Vibration	<p>Clarification on the conditions that triggered the removal of noise data would be welcomed.</p>	Construction Operation Decommissioning
Noise and Vibration	<p>It appears that no construction vibration impacts are presented. Clarification of the reason why is required (e.g. distances from receptors are sufficient).</p>	Construction
Water Environment	<p>There are several impacts on the water environment as a result of the Scheme. This includes increased flood risk, pollution from surface water runoff, increased water volume discharge and inappropriate wastewater disposal, among others.</p>	Operation
Water Environment	<p>The risk of flooding and drainage remain key concerns for WLDC. The preparation and implementation of mitigation measures to a high quality is required.</p>	Operation
Ground Conditions	<p>WLDC seeks clarification that the assessment methodology is informed by, and is compliant with, Government and/or DMRB methodologies. If this is not the case, an explanation of the robustness of the approach taken would be welcomed.</p>	Construction Operation Decommissioning

Ground Conditions	The ES Chapter appears to only consider potential impacts from land contamination. WLDC considers that the assessment methodology is not clearly described, nor how it is appropriate for the scheme.	Construction Operation Decommissioning
Ground Conditions	Potential effects on mineral resources or geologically sensitive receptors, such as Sites of Special Scientific Interest (SSSI), do not seem to have been explained or considered.	Construction Operation Decommissioning
Ground Conditions	The two study areas (Principal Site and Cable Route Corridor) have not been defined in the ES chapter.	Construction Operation Decommissioning
Glint and Glare	WLDC would welcome clarification as to whether consideration has been given to views from upper floors of properties. It is unclear as to whether they have been considered.	Construction Operation Decommissioning
Air Quality	WLDC considers that the scheme in solus will give rise to a risk of air quality degradation during the construction phase. These impacts will be further increased should projects be constructed on a cumulative basis (either in sequence or all at the same time). The lack of an enforceable co-ordinated approach between developers results in no further mitigation being applied to minimise effects between projects.	Construction
Materials and Waste	The Scheme will generate substantial quantities of both construction materials and wastewater. Employee activity will generate commercial, food and sewage waste.	Construction
Materials and Waste	WLDC has significant concerns regarding the method for recycling materials as a consequence of maintenance (replacement) and decommissioning of panels, BESS and substation infrastructure. WLDC understands that there is insufficient capacity within the District, the Region and the UK as a whole to deal with the waste. The uncertainty of the replacement frequency and volume of panels, BESS and substation infrastructure, including duration of replacement construction activities, give rise to a potential significant impact that remains unassessed and not controlled under the scope of the dDCO.	Operation Decommissioning

Other Environmental Matters	It appears to WLDC that the project assessments do not take into account achieving positive mental and physical health outcomes.	Construction Operation Decommissioning
Other Environmental Matters	WLDC considers that the ES does not directly address a number of health determinants including health-related behaviours, social environments and the bio-physical environment.	Construction Operation Decommissioning