

**Nationally Significant Infrastructure Project: EN010142
Tillbridge Solar farm**

**Response to The Examining Authority's written questions and requests for
information (ExQ1) issued on 19th November 2024**

Prepared by Lincolnshire County Council (LCC)

December 2024

The following table sets out the Council’s response to the Examining Authority’s (ExA’s) written questions and requests for information (ExQ1) where a response from the County Council was sought.

ExQ1	Question	LCC Response
Q1	General and cross-topic questions	
1.7	<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’ • ‘(Hemswell Cliff) Policy 2: Delivering Good Design’. <p>Could LCC please elaborate on which Neighbourhood Plans these polices are contained within and provide copies of these policies?</p>	<p>Sturton By Stow, and Stow Policy 5: Delivering Good Design is contained within the Sturton by Stow and Stow Neighbourhood Plan 2019-2036 (Final Approved Version March 2022), page 44. Prepared by Sturton by Stow and Stow Neighbourhood Plan Steering Group on behalf of Sturton by Stow Parish Council & Stow Parish Council. Available Sturton by Stow and Stow Neighbourhood Plan. Also available on the West Lindsey District Council Website: https://www.west-lindsey.gov.uk/planning-building-control/planning/neighbourhood-planning/all-neighbourhood-plans-west-lindsey/sturton-stow-stow-neighbourhood-plan</p> <p>Policy 5: Delivering Good Design</p> <p>1. As appropriate to their scale, nature and location, developments should demonstrate good quality design and respect the character and appearance of the surrounding area. All development proposals will be assessed to ensure that they effectively address the following matters, as described in detail in each Character Area chapter of the Neighbourhood Profile:</p> <ol style="list-style-type: none"> siting and layout; density, scale, form and massing; detailed design and materials; landscaping and streetscape. <p>Hemswell Cliff Policy 2: Delivering Good Design, is contained within Hemswell Cliff Neighbourhood Plan 2021-2036 (Referendum Version) page 37, and was produced by</p>

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		<p>Hemswell Cliff Parish Council. Available: Hemswell Cliff Neighbourhood Plan (Referendum Version). Also available on West Lindsey District Council website: https://www.west-lindsey.gov.uk/planning-building-control/planning/neighbourhood-planning/all-neighbourhood-plans-west-lindsey/hemswell-cliff-neighbourhood-plan</p> <p>Policy 2: Delivering Good Design</p> <p>1. As appropriate to their scale, nature, and location development proposals that include the creation or alteration of buildings or spaces should embody principles of good design, including that the development:</p> <ul style="list-style-type: none"> i) will function well and add to the overall environmental quality of Hemswell Cliff, ii) is visually attractive with regard to design, layout and landscaping; iii) is sympathetic to Hemswell Cliff’s character and history, as described in the Hemswell Cliff Character Assessment (Appendix D); iv) establishes or maintains a strong and appropriate sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; v) incorporates and/or responds appropriately to open space suitable for the scale and form of development proposed; vi) creates places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
1.9	<p>Planning balance</p> <p>The Examining Authority (ExA) notes LCCs conclusions contained in its WR [REP2-012]. However, could LCC</p>	<p>.</p> <p>This states “Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State</p>

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	<p>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>considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.”</p> <p>The thrust of this paragraph is that only in exceptional cases will the impact of these residual effects outweigh the need for CNP infrastructure. In is not clear what the test is to be identified as 'exceptional' in which case it appears to be the judgement of the Secretary of State as to what exceptional is.</p> <p>The County Council it has been shown that the landscape and visual impact of the proposed development when considered cumulatively with the other schemes that have been consented, Cottam and West Burton that the negative impacts on the landscape are at a regional scale of significance. It is the Council; assertion that to create an impact at a regional scale meets the case of 'exceptional' and for that reason the need for the development is not outweighed by the exceptional harm that the Council has demonstrated with its landscape evidence. Consequently in the planning balance the harm (residual effects) of the development is exceptional and therefore outweighs the need for the scheme.</p>
1.11	<p>Good design All parties should be aware that Nationally Significant Infrastructure Projects: Advice on Good Design was published on 23 October 2024. All parties (in</p>	<p>No comment from LCC</p>

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	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?	
2.	Biodiversity and Ecology	
2.15	HRA 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?	LCC defers to Natural England on matters relating to the HRA however, the Applicant's explanation is reasonable, and the approach is in line with that taken by similar proposals in the area. LCC notes that the Applicant has agreed to participate in a programme of lamprey monitoring with other developers in the area and welcomes this approach.
3.	Climate change	
3.10	Climate Change 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 "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"?	Due to the limited time between the need for the LIR to be submitted at DL1 and the Committee meeting when the Council confirmed its written comments on the application there was no opportunity to update the LIR before it needed to be submitted at DL1. Consequently the Council's views on climate change and GHG emissions are those set out in its written response WR [REP2-012] rather than what is stated in paragraph 7.17 of the LIR.
3.11	Alleged Harm	The Council is of the view that a list of projects that are connected in some way for the four projects in West Lindsey they are connected in that they share a cable route to either West Burton or Cottam Power Station and therefore have similar

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	<p>The Council’s WR [REP2-012] states in part: “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 for such an assessment, particularly given this is the list of projects considered for other cumulative effects.”</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>	<p>characteristics they are connected in this way. In the interrelationship that has been prepared for each project at examination stage has looked at a wide range of topics to consider the cumulative impacts of the 4 projects could look at in combination GHG impacts.</p> <p>Once this work has been undertaken it could be assessed and the Council could come to a view if there is harm from the combined GHG of all the schemes and then if this is contrary to policy. The Council does not consider that this cumulative impact assessment has been undertaken so is not in a position to confirm if harm and consequently policy conflict exists.</p>
5.	Cumulative and in-combination effects	
5.2	<p>Pluvial Risk</p> <p>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?</p>	No response
6.	Draft Development Consent Order (DCO)	
Schedule 15 – Protective Provisions		

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6.5	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?	The Council is satisfied regarding the Protective Provisions that has been captured for Lincolnshire Fire and Rescue.
7.	Heritage	
7.1	<p>Assets scoped out</p> <p>ES paragraph 8.9.7 [APP-039] states: “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.”</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>	<p>The Council have concerns regarding certain aspects of the assessment methodology. Specifically, the methodology does not adequately consider the group value of historic farmsteads within the scheme area. These assets collectively contribute to the historic character, setting, and significance of the landscape, and their potential harm from the development warrants further consideration within the ES.</p> <p>Additionally, the valuation method applied to historic farmsteads appears overly selective and reductive. The binary classification of non-designated historic farmsteads as having 'low value' fails to account for their cumulative significance or their contribution to the broader landscape character. This approach risks underestimating the potential adverse effects on this predominant class of assets within the scheme area. A more nuanced assessment that considers both individual and collective value would provide a more accurate understanding of the potential impacts.</p>
7.3	Corringham Windmill Setting	The proposed development will harm the setting of Corringham windmill by altering its southeastern views, transitioning them from a rural landscape to a semi-

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	<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>“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”.</p> <p>Bearing in mind the historic function of the building, is the Applicant, WLDC and LCC confident that its setting is confined to “the field in which it is located alongside the road and relationship to Corringham” as asserted in the ES?</p>	<p>industrial character. This change adversely affects the ability to interpret the historic function of the windmill and its relationship to the surrounding landscape. The Council recommend the applicant consider further setbacks to the solar array to reduce the potential harm to this heritage asset</p>
Archaeology		
7.10	<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 / NNC's latest position on whether sufficient archaeological investigation has been carried out?</p>	<p>LCC and NCC understand that there are access issues but are confident that the Applicant will undertake the work as soon as it is possible and certainly in advance of the construction programme. The results of this late stage of evaluation will need to inform the mitigation strategy.</p>

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7.12	<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>	<p>LCC and NCC are satisfied that we will come to an agreement regarding the mitigation strategy with the Applicant and that the outstanding evaluation results for the cable route will inform that part of the mitigation strategy.</p> <p>We do however recommend that the current proposed Requirement wording for section (1) be amended from ‘the mitigation strategy’ to ‘the archaeological mitigation strategy agreed with the relevant local planning authorities and Historic England.’</p>
7.13	<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: “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.” Is LCC satisfied with this conclusion and the basis upon which it has been reached?</p>	<p>LCC is not satisfied that this will cause less than substantial harm. There is no evidence put forward to support such a statement.</p> <p>Torksey Viking Winter Camp is a unique and incredibly important historic and archaeological site and any damage whatsoever to it is substantial harm.</p> <p>The nature of the site is such that there is potential for archaeology of national and even international importance may be found and impacted anywhere across the site.</p>
7.14	<p>Could the statutory parties please provide representations in relation to the Archaeological Mitigation Strategy [REP1-025] submitted by the Applicant?</p>	<p>Following consultation by the applicant in September 2024 LCC provided comments (also with NCC) to the Applicant on the draft AMS which the Council understand have been captured in the latest version of the AMS (REP1-025) which is expected to be submitted at Deadline 3.</p>

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8.	Human health, safety, accidents and major incidents	
8.2	<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>	<p>The details appear to capture all of the requirements as per the NFCC guidance. The Council are happy with the content, recognising that there are caveats in-line with updated guidance from the NFCC and more specific details on water supplies and locations.</p> <p>Early engagement has outlined LFR's requirements and expectations. The Council are conscious that the provision of water will need to be integrated within the site design. Requirements as per the NFCC guidance need to be considered and adhered to, but the Council are happy to work with developers to consider location and access etc. Fire fighting operations are developing all of the time, so would need to gain access to the water supplies from a safe distance from the BESS involved, and would then adopt a defensive firefighting tactic. We have made these requirements clear to the developer. At this stage we need to do further work with the developer to ensure adequate water provision is considered.</p> <p>In relation to site access we have made the following observations:</p> <p>The access ladder platform can reach 32m high and would be used for incident observation / thermal imaging and in conjunction with main jets for application of water from height – how would this fit with the BESS sites and the overhead power lines? Access may be OK but operation is another consideration.</p> <p>Its noted that the access roads are 4m wide, which would not enable two-way traffic for HGV type vehicles. From early drawings it appears that access / turning is facilitated by using the road around the BESS compound. Assurance is required on the size of vehicles planned are based on, as the junctions do not appear to be HGV enabled.</p>

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		<p>In the event of a BESS compound becoming well developed, LFR operations would not allow us to drive past / around it and possibly reversing distances would be prohibitive as some of the routes to the BESS could be considerable. Consideration should be given to observations points and turning points for attending fire appliances.</p> <p>The current FBSMP outlines requirements stipulated by LFR (and national guidance), but still lacks specific details, e.g. water provision and design. On-going engagement with the developer is required to specific details and site design can be fully understood to allow LFR to confirm suitability.</p>
8.5	<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? Ref: 6.1 Chapter 17 Other Environmental Topics [APP-048].</p>	<p>Reference in this document is made to the existing Glentworth K site and that the developer has been contacted to ensure sufficient offsets from the safeguarded Glentworth K Oil site have been incorporated within the Scheme design. However no mention is made to the recently granted extension to the K site which is some 500m west of the existing Glentworth K site and measures have been put in place to safeguard this recently approved extension. There is an example of a solar development been adjacent to another oil production site in the County which operate without any issues. The only difference from this existing arrangement is that the solar development does not include a BESS and so provided the BESS is some distance from the oil site and any expansion would be closer to the designated BESS area it is not considered that this should present any risks.</p>
9.	<p>Landscape and Visual Impact</p>	
9.11	<p>New Bridleway Update</p> <p>ES Paragraph 12.6.17 [APP-043] states: “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</p>	<p>There are two DMMO applications for this route over the same land. One submitted in 2014 (DMMO371) and one in 2024 (DMMO843).</p>

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	<p>Cliff between Harpswell and Glentworth, parallel to Middle Street.” Can LCC and the Applicant please provide an update?</p>	 <p>The Council have already determined DMM0371 and have made an Order in 2023 to add the bridleway to the definitive map, please see the attached order. This</p>

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		<p>order has received objections and has been sent to the Planning Inspectorate (PINS) for determination. It was sent on 31st May 2024 (Ref: ROW/3345516). It is currently in the initial validation stage at PINS.</p> <p>The Council doubts that it will have been resolved by April 2025, but the timescale is in the hands of PINS so the Council cannot guarantee when they will look at it. It is anticipated that the decision for DMMO371 will also resolve the application made for DMMO843</p>
9.18	<p>Effect of mitigation planting</p> <p>LCC LIR paragraph 5.14 [REP1A-001] states in part: “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.”</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>	<p>The comment in LCC LIR paragraph 5.14 [REP1A-001] relates to planting to mitigate the visual effects of the development. The Council accept that planting can be an effective way to screen development proposals, however this needs to be carried out in a way that is sensitive to the existing landscape character, or meet any aims of a published character assessment to improve or introduce new planting to an area. LCC wish to clearly identify that while residual visual effects have been assessed as reducing at 15 years through mitigation planting, this is completely dependent upon the successful establishment of the planting and it growing in a manner that is anticipated within the LVIA, and illustrated on the accompanying visualisations. This is always going to be a risk, and if the planting does not establish as anticipated, the residual effects will likely be higher than judged.</p> <p>The success and effectiveness of planting to mitigate (screen) proposals is very much dependent upon a successful planting and subsequent establishment period, where appropriate plant species are installed to recognised horticultural standards and practices, maintained over an appropriate establishment period, which we would expect to last to the residual phase of the LVIA (15 years) as a minimum, and any plant failures over this period are replaced. This should be appropriately covered in the oLEMP.</p>

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		The overall character of the area is relatively open, and too much planting without due care for location, simply to screen could have detrimental impacts. The PROW and local roads in the study area enjoy an open aspect across some areas of the study area, for example along the ridge at the eastern Site extents where there are extensive long-range views south across the Site (as illustrated on VP4) or along the A631 (VP1) along the northern extents. Therefore, care needs to be taken to prevent the loss of this character through an overbearing set of mitigation proposals. It is noted that appropriate development offsets, and with careful design, will go some way to address the matter raised. However, VP2b from Common Lane west of Harpswell is an example of where the development has foreshortened the open view, and while planting is shown to screen the development, the view is ultimately changed by the mitigation planting.
13.	Transport and access	
13.8	Baseline Data 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?	The Council is satisfied that this is a representative period for undertaking a survey to establish baseline data.
13.11	FCTMP Paragraph 9.11 of LCCs LIR [REP1A-001] states in part: ‘The Framework Construction Traffic Management Plan (ES Vol 7) needs to be captured as a requirement rather than a stand alone document.’ However, Requirement 14 of the draft DCO [APP-014] relates to the FCTMP [REP1-021]. Could the Council please confirm the	The Council is in dialogue with the applicant on this matter and recently held a meeting to discuss such matters.. The Council is waiting to see the applicant’s response at DL3 but is expected to be in agreement with the Council’s approach to capturing this.

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	acceptability or otherwise of this requirement/approach to securing the FCTMP?	
14.	Water environment including flood risk	
14.2	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].	The Council has no comment to make on this question.
14.3	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?	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 - Any BESS fire suppression systems must conform to NFPA 855 (2023) guidelines. Guidelines outline that there should be a <u>separate</u> water supply for the internal water suppression systems.
14.4	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].	The Council has no comment to make on this question.

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14.5	<p>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].</p>	<p>The Council has no comment to make on this question.</p>
15.	Other planning matters	
15.1	<p>Glentworth K Oil Site 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>	<p>Policy M12 - Safeguarding of Existing Mineral Sites and associated Minerals Infrastructure of the Lincolnshire Minerals and Waste Local Plan (2016) states:- "Mineral sites and associated infrastructure that supports the supply of minerals in the County will be safeguarded against development that would unnecessarily sterilise the sites and infrastructure or prejudice or jeopardise their use by creating incompatible land uses nearby".</p> <p>The policy provides a list of those activities which are exempt from this policy. The proposed development is not listed and therefore does not benefit from an exemption.</p> <p>An explanatory paragraph of the Policy notes the future use of mineral sites and associated development could be constrained if sensitive developments such as residential development are permitted nearby, Within a 250m buffer zone around the mineral site the County Council may advise that development should not be permitted if it would constrain the effective operation of existing or future use of land identified for mineral use.</p> <p>Provided the area within 250m of the site is only to be used to station solar panels and associated fencing of the mineral site it is not considered that the mineral site</p>

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		would be compromised by the proposed development and therefore not in conflict with Policy M12.
Minerals and waste		
15.5	<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>	<p>Recycling (particularly PV panels)</p> <p>LCC welcomes the update of the Framework OEMP to commit to 70% diversion from landfill, and that the applicant’s modelling of 70% recovery as a “realistic worst case” suggests that ‘cumulative impacts would be not significant’. However, given that their “absolute worst case” (zero diversion) suggests that ‘cumulative impacts would be significant’, and in light of the lack of suitable recycling facilities/capacity for PV panels at present, the applicant will need to keep their findings under review during the lifetime of the project (for operational waste) and particularly as decommissioning approaches.</p> <p>Landfilling (particularly PV panels)</p> <p>Although LCC recognises that the assessment methodology uses landfill capacity, on a practical level the Council would query the assumption that any waste PV panels could go to landfill if not recycled. Given their nature as WEEE containing some hazardous elements, every effort should be made to avoid landfilling them.</p> <p>Whilst LCC will indeed continue to plan for sufficient landfill capacity, given the changing shape of the waste management industry, the long lifespan of the project, panels will reach end of life throughout the duration of the project and the nature of much of the waste arisings, this reinforces the need to keep waste management arrangements under review throughout the development lifetime.</p> <p>EMPs and RMPs</p> <p>LCC is satisfied with the applicant’s explanation of how these documents, as framework and then full versions, will set out the applicant’s waste management intentions for approval by LCC at the appropriate stages of the project.</p> <p>Operational Waste Management Plan (OWMP)</p>

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		<p>LCC welcomes the addition to the Framework OEMP that the details we requested will be included in the OWMP.</p> <p>Study Area in Environmental Statement relating to waste management (p87/88)</p> <p>LCC welcomes the clarification that the use use of England for hazardous and East Midlands for other waste aligns with Defra’s 2010 Strategy as referenced. However, our expectation is that the applicant will try to conform to the proximity principle more closely wherever practicable.</p> <p>Cumulative impacts</p> <p>Subject to our comments above regarding recycling and landfill capacity, LCC welcomes that the applicant has assessed the cumulative impacts of multiple similar projects which may be happening concurrently.</p>