Tillbridge Solar Project

EN010142

Volume 9
Draft Statement of Common Ground with 7000 Acres

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The Infrastructure Planning (Examination Procedure) Rules 2010

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tillbridgesolar.com

@: info@tillbridgesolar.com T: 0800 046 9643

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1. Introduction

1.1 Purpose of this Document

1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (“the Application”) for the Tillbridge Solar Project (“the Scheme”) made by Tillbridge Solar Limited ("the Applicant"). The Application was submitted to the Secretary of State for Energy Security and Net Zero ("the Secretary of State") for a Development Consent Order (DCO) ("the Order") under section 37 of the Planning Act 2008 ("PA 2008") (Ref. 1) and accepted for examination on 8 May 2024.

1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or on the Planning Inspectorate’s website at https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010142/documents.

1.1.3 SoCGs are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination. This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties and where agreement has not (yet) been reached. The SoCG will be progressed during the examination period to reach a final position between the Parties and to clarify if any issues remain unresolved. This SoCG will be revised and updated as appropriate and/or required by the ExA at relevant examination deadlines. Parties to this Statement of Common Ground

1.1.4 This SoCG has been prepared between (1) the Applicant and (2) 7000 Acres Group (jointly referred to as the Parties).

1.1.5 The Applicant is a joint venture between Tribus Clean Energy Limited and Recurrent Energy, a subsidiary of Canadian Solar, who are both experienced developers of renewable energy projects.

1.1.6 7000 Acres Group is a collection of local residents formed from over 30 villages in and around the footprint of the West Burton Solar Project, Cottam Solar Project, Gate Burton Energy Park and the Scheme.

1.1.7 The approach taken for this activity has been to consider the broad list of considerations identified by 7000 Acres in their Relevant Representation [RR-001] and to focus on certain topics which 7000 Acres believe have either been inadequately covered in the course of examination or are most material to the decision. The discussion on Scheme benefits, health impacts, the material impact of cumulative schemes (including traffic) and land use have therefore been explored in most detail and are therefore included in Section 3. All remaining issues raised have been recorded in Section 4.

1.2 The Scheme

1.2.1 The Order, if granted, would authorise the construction, operation (including maintenance), and decommissioning of ground-mounted solar photovoltaic (PV) arrays. The Scheme will also include associated development to support the solar PV arrays.

1.2.2 The Scheme is made up of the Principal Site, the Cable Route Corridor and works to the existing National Grid Cottam Substation. The Principal Site comprises the solar PV arrays, electrical substations, grid balancing infrastructure, cabling and areas for landscaping and ecological enhancement.

1.2.3 The associated development element of the Scheme includes but is not limited to access provision; a Battery Energy Storage System (BESS), to support the operation of the ground mounted solar PV arrays; the development of on-site substations; underground cabling between the different areas of solar PV arrays; and areas of landscaping and biodiversity enhancement.

1.2.4 The Scheme also includes a 400kV underground Cable Route Corridor of approximately 18.5km in length connecting the Principal Site to the National Electricity Transmission System (NETS) at the existing National Grid Cottam Substation. The Scheme will export and import electricity to the NETS.

1.3 Terminology

1.3.1 Sections 3 and 4 summarise the issues that are ‘agreed’, ‘not agreed’ or are ‘under discussion’.

1.3.2 These terms are used as follows:

a. “Agreed” indicates where the issue has been resolved;

b. “Under discussion” indicates where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties;

c. “Not Agreed” indicates a final position where the Parties have agreed to disagree.

2. Record of Engagement

2.1.1 A summary of all meetings and correspondence that has taken place between the Parties in relation to the Application is outlined in **Table 2-1**. This includes email correspondence between the Parties to discuss sharing of information, arrangement of meetings and where appropriate to comment on draft documentation. **Table 2-1** reflects the key meetings and emails of note.

Table 2-1: Record of Engagement

Date	Form of Correspondence and attendees	Key topics discussed and key outcomes
5 November 2024	Microsoft Teams Meeting Representatives of 7000 Acres Group Applicant's consultancy team	Structure and content of the SoCG and approach to identifying the status of the matters.
17 December 2024	Microsoft Teams Meeting Representatives of 7000 Acres Group Applicant's consultancy team	The need to focus on specific topic areas. Detailed discussion on health impacts.
6 February 2025	Microsoft Teams Meeting Representatives of 7000 Acres Group Applicant's consultancy team	Specific topic areas highlighted, with discussions on need / benefit and traffic, with brief coverage of health and land use.

3. Main Areas of Discussion between the Parties

3.1.1 **Table 3-1** summarises the main matters discussed from those raised in 7000 Acres Group's relevant representation [RR-001], the Applicant's position and the status of discussion for each of these matters. **Table 4-2** summarises the specific actions that 7000 Acres Group and the Applicant have agreed to review, in order to progress matters that are under discussion.

Table 3-1: Main Areas of Discussion with 7000 Acres Group

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
1.1	Impacts of the Scheme outweigh its benefits	**Statement of Need [APP-210]** **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**. **Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP3-031]** **Planning Statement [REP3-027]** **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]**	The limited energy security and decarbonisation benefits the Tillbridge Solar Project claims to achieve are outweighed by the significant adverse impacts it would have on the region (its communities, ways of life, landscape and its wildlife) and on the nation (in particular, pressure on land use and food security). For development at such a scale, the damaging impacts of Tillbridge solar cannot be mitigated. In addition, the Tillbridge Solar Project (TSP) is one of four NSIP proposals in West Lindsey, Lincolnshire, which fall within a 6 mile radius. Together, these would cover 10,0000 acres of farmland and become the largest solar complex in Europe, and even globally. Due to the unprecedented nature of this development and the significant impact on the area and communities, all NSIP solar projects need to be considered together by the Planning Inspectorate and Secretary of State, i.e. Cottam Solar Project, West Burton Solar Project, Gate Burton Energy and the Tillbridge Solar Project, with other schemes in earlier stages of planning in the adjacent area, such as One Earth Solar Farm and Steeple Solar. The bulk of discussion with the Applicant related to the explicit difference between "need" and "benefit". 7000 Acres argue that, while need for green energy is established, the benefit must also be considered when weighing the impacts and benefits in the planning balance, 7000 Acres understands that the Applicant has taken the position that need equates to benefit and that there is no difference between the two. 7000 Acres interprets NPS EN-1 as there being no requirement to consider contribution of a project in establishing need (3.2.6 – 3.2.8), but that in weighing impacts and benefits, the contribution must be considered (4.1.5). The Applicant's position that "need-equates-to-benefit" would effectively render any weighing of impacts and benefits unnecessary and therefore become a licence to construct anything without ever understanding its benefits – and therefore making the assessment of any harms meaningless. 7000 Acres assert that the benefits of the scheme are limited because of	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 (Ref. 2) and National Policy Statement for Renewable Energy EN-3 (Ref. 3) that there is a critical national priority for the provision of nationally significant low carbon infrastructure in the UK. As discussed in the Applicant's **Statement of Need [APP-210]**, this includes low carbon energy generation using solar technology. The cumulative effects and inter-relationships with other projects have been considered within the Environmental Statements of each of the schemes (refer to **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]** for the Tillbridge Solar Project's assessment) and through the **Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP3-031]**, prepared in collaboration with Gate Burton Energy Park, Cottam and West Burton Solar Projects. As set out within the **Planning Statement [REP3-027]** submitted in support of the Tillbridge Solar Project, the Applicant acknowledges that significant landscape and visual effects remain when the Tillbridge Solar Project is considered on its own and in combination with the other solar NSIPs. However, the made development consents for Gate Burton Energy Park and Cottam	Not Agreed	Low

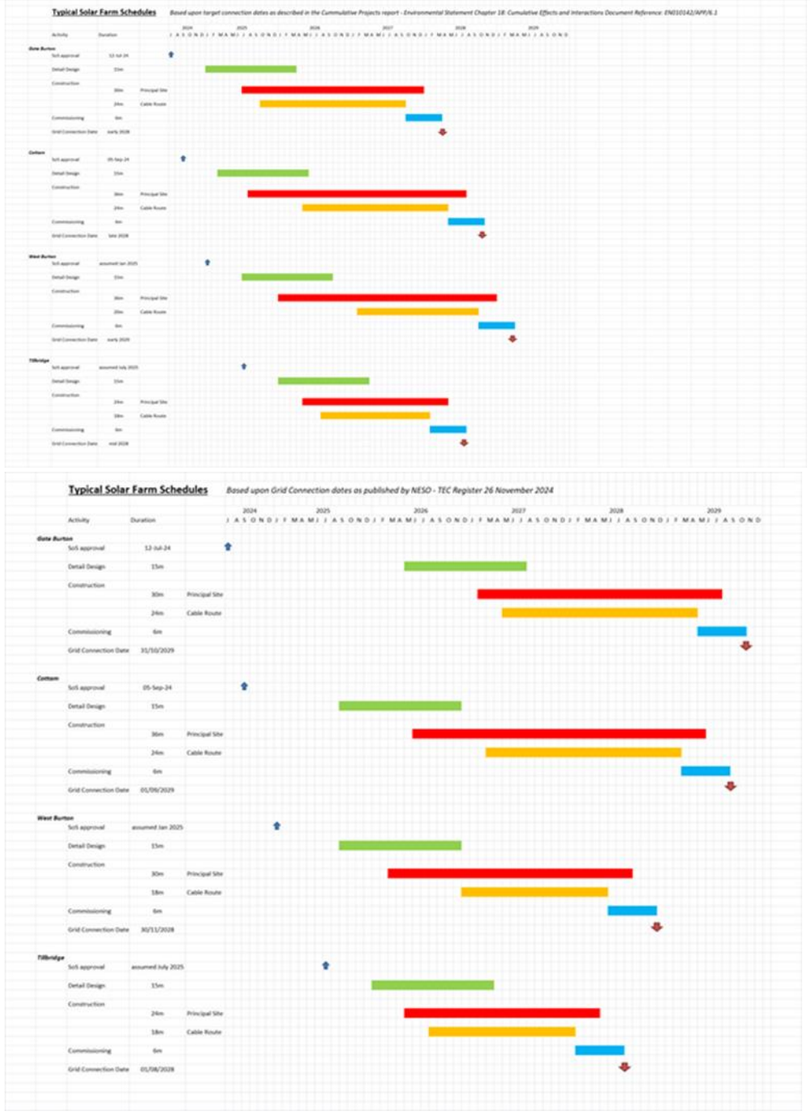
Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
			1. the low solar yield in the UK in global terms, makes the deployment of large ground mounted solar a poor choice of land use. 2. the intermittent nature of renewables, linked with the timing of solar generation, which is largely out of phase with demand, means that the value of MWHr's produced by solar is lower than other forms of production. Energy flexibility becomes more essential as more intermittent renewables come onto the system, otherwise, the only means for output to match demand is to turn off the renewable power (for which the developer is typically still paid). The value of the power is therefore less than the typical market, owing to the when its peak is produced. 3. The inherent nature of solar and the mismatch between its supply and national demand, naturally leads to periods of "feast and famine" on the electricity system, requiring energy to be rejected, and back-up generation – both of which add to prices. As more intermittent renewable generation comes on to the system, particularly for solar, which is out of phase with demand, this makes the challenge of balancing the electricity system (supply with demand), more difficult for the National Grid. With over 150,000MW in the development queue, and 18,000MW already installed, there is the potential for significant excess capacity to be constructed – thereby increasing periods of curtailment, where excess renewable generation is rejected. In an electricity system of 25,000MW to 35,000MW peak capacity in the summer, it is unclear how such capacity can contribute anywhere near even the 11% yield of a typical solar panel in the UK (without curtailment). Assuming the 500MW scheme yields an approximately 11.2% load factor, given the low UK solar gain, the scheme would provide slightly around 0.5TWh per year. This is approximately 0.16% of the UK's current national demand (300TWh), and around 0.07% of the UK's demand in 2050 (expected to be in excess of 700TWh). This power will be overwhelmingly produced at times when demand is lowest and prices are lowest, therefore this is some of the least valuable energy provided to the electricity system. The benefit of this development is therefore extremely limited, and this must be considered against the harms that the scheme will create. Overall therefore, in the planning balance, minimal weight should be given to the contribution or benefit the scheme provides. See the 7000 Acres detailed submission in REP2 -022, REP2-028 and REP2-033	Solar Project agree that despite this negative weight, the benefits of these solar schemes are not outweighed by the adverse impacts confirming that development consent should be granted. In the case of the Tillbridge Solar Project, the primary policy consideration is its compliance with the designated Energy NPS. Given the critical national priority to provide low carbon infrastructure, which includes the deployment of large-scale ground mounted solar, NPS EN-1 (Ref. 2) states at paragraph 4.2.15 that *"all but the most exceptional circumstances, it is unlikely that consent will be refused."* The Applicant has provided a further response on this matter in **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]** under Q2.1.19. In summary, paragraph 3.2.8 of NPS EN-1 states the following: "*The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS*." In accordance with NPS EN-1, the substantial weight to be given to the need for the Scheme forms part of the overall planning balance, and the contribution to the urgent need should be afforded substantial positive weight in favour of the Scheme. In determining the Scheme, the Secretary of State must then weigh the benefits of the Scheme against its impacts.		

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
1.2	Impact on Health and Wellbeing	**Chapter 11: Human Health [APP-042]** **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]** **Chapter 15: Soils and Agriculture** of the ES **[APP-046]** **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]** **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 3 [REP4-049]**	7000 Acres believe the Tillbridge Solar Project will have a significant adverse impact on the general health and wellbeing of residents (rural mental health is a particularly important issue locally), significantly through a reduction in quality of life. The scheme will deprive access to visual amenity, spoil views, destroy agricultural jobs and livelihoods. Directly associated with this, there is the possibility of socioeconomic decline from the cumulative effect and size of these developments, where people seek to move away but are trapped, unable to sell properties, and people become reluctant to move to the area, "hollowing out" the communities. The trajectory is to adversely affect people's health and wellbeing, and an associated impact on health inequality. Such impacts have not been appropriately considered by the developer. In discussions with the Applicant during SoCG meetings, 7000 Acres explained why the current studies have not adequately considered the health impacts of such extensive development. One of the fundamental points that has been missed is the change to quality of life for people living in communities affected by the development, driven by the deteriorated experience of living in villages that have been deprived of green amenity, living among extensive scale solar developments, loss of views, loss of farming jobs and livelihoods, as well as living for extensive periods (years) with disruption during construction and phases of maintenance / panel replacement. All the impacts on the villages and people living there are adverse – and there is a clear potential for significant impacts on mental health, which have not been considered by the Applicant's standard methodology. Combined with the unprecedented nature of the scale of development – with multiple extensive developments in the same area, the failure to adequately address the potential for mental health impacts is a serious omission. The Applicant has acknowledged that the process does not cover these aspects "by design", but this means that the process does not adequately consider the impacts on the communities of development at the proposed scale – particularly when the cumulative impact of multiple schemes is considered.7000 Acres believe the material provided by the Applicant and the oversight provided by the examination process are therefore inadequate to properly consider the impact on human health, wellbeing and quality of life. In some ways, this is not surprising, there has never been development that has required such sudden land use change at this scale in the UK, therefore the	**Chapter 11: Human Health** of the ES **[APP-042]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). The Applicant acknowledges that the operation of the Scheme will result in a residual significant adverse effect upon a small number of visual receptors, as presented in **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]**. However, **Chapter 11: Human Health** of the ES **[APP-042]** concludes that the likely effect on human health arising from impacts on landscape and visual amenity during the operation of the Scheme are not significant, given that a low number of residential receptors will be affected, and by operation year 15 it is likely that people will become used to the change in landscape and visual amenity and it will therefore have less of an impact on mental health and wellbeing. In relation to agricultural jobs and livelihoods, **Chapter 15: Soils and Agriculture** of the ES **[APP-046]** undertakes an assessment of the Scheme in relation to farming circumstances and explains that several separate farm businesses occupy land within the Principal Site. It is acknowledged that during construction the land will not be available for grazing livestock or equestrian use. This effect is short term and temporary. During operation, the Scheme's occupation of landowners' land, as a new diversified enterprise, will provide a new income stream independent of variations in profitability of arable production. This diversified enterprise may	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
			impacts on affected communities has never been explored, but the result is that residents in the area feel they are the subjects of a huge experiment. Overall the quality of life and mental health impacts of such massive, unprecedented development have not been considered. Tillbridge is the 4th of 6 NSIP-scale solar developments within a concentrated area. The cumulative sprawl of development will impact over 30 villages and their residents. The human health and wellbeing of the people in the community will be adversely impacted by such an extensive loss of green amenity. Even within the process, 7000Acres find it to be a serious omission that there is no Statement of Common Ground with any of the health and care bodies within the region, to explore the impacts on mental health, health care and social care provision. Within the UK, there has never been such extensive change in land use in such a short time – so there is no case history of the health and wellbeing aspects of such a radical change, nor has this been researched or considered as part of the proposals. See detailed comments in REP2-032 and separate Deadline 5 7000 Acres WR on Health and Wellbeing.	also enable managers of farm businesses that are currently too small to be economically viable, to wind up the farm business. This is assessed to result in a temporary moderate beneficial effect, which is significant, in **Chapter 15: Soils and Agriculture** of the ES **[APP-046]**. In addition, **Chapter 11: Human Health** of the ES **[APP-042]** concludes that there will be beneficial impacts on employment and income during construction and decommissioning, prioritisation of walking and cycling routes (through new permissive paths) and climate change (through a substantial emissions reduction relative to the without-scheme baseline) during operation. These impacts will lead to positive effects on human health, including both physical and mental health. The cumulative impacts of the Scheme on human health are set out in **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**. The effects of the Scheme will be mitigated by the measures set out in the management plans submitted with the Application, alongside the measures taken by other projects in their own management plans, which are secured by each projects DCO. Overall, the impact of the Scheme on human health, on its own and cumulatively with other developments is considered to be not significant (refer to **Chapter 11: Human Health [APP-042]** and **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**). The Applicant provided further information on its approach to the assessment of impacts on health and wellbeing (including mental health) within the post-hearing note included within the **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 3 [REP4-049]**, pages 4-7.		

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
1.13	Traffic disruption.	**Framework Construction Traffic Management Plan (CTMP) [EN010142/APP/7.11(Rev05)]** **Chapter 13: Noise and Vibration** of the ES **[AS-006]** **Chapter 16: Transport and Access** of the ES **[APP-047]** **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**	The volume of road movements and size of vehicles, particularly during construction, maintenance and decommissioning are not compatible with the local, inadequate road infrastructure. Again, there is a cumulative affect with the potential for 4 major solar developments in the same region. The Tillbridge Solar Project does not adequately consider the impact of traffic through rural routes and villages and the potential for disruption, damage, and noise. Review of the HGV movement data raises questions with regard to the validity of the daily movement calculations for the Cable Route when compared to the Principal Site. Please confirm? *ES Chapter 16 Transport and Access* *EN010142-000230-6.1* *Construction Traffic Flows* *Principal Site* *16.4.22 For the purposes of this assessment and based on the information provided in support of the application, the peak daily number of HGVs, LGVs and construction staff required for the Principal Site are identified below. It should be noted that the forecast numbers below include consideration of daily variation and peak daily movements to provide a robust assessment:* *a. 120 HGV deliveries (240 movements per day);* *b. 60 LGV deliveries (120 movements per day); and* *c. 1,225 construction staff, with the forecast number of staff vehicles identified below.* *c. At peak, there will be up to 65 HGVs travelling to/ from each of the 4 Site accesses/ cable contractor compounds per day and up to seven HGVs travelling to/ from each of the two trenchless crossing sites per day. This equates to a total peak of 272 HGVs (544 two-way vehicle movements) for the Cable Route Corridor and trenchless crossing works combined.*	The **Framework Construction Traffic Management Plan (CTMP) [EN010142/APP/7.11(Rev05)]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. The **Framework CTMP [EN010142/APP/7.11(Rev05)]** has been agreed with both, Lincolnshire County Council and Nottinghamshire County Council, as can be evidenced from the respective SoCGs. As detailed in the **Framework CTMP [EN010142/APP/7.11(Rev05)]**, highway condition surveys will be undertaken before, during and after the construction to identify any damages which are as a result of the development that need to be remediated. Where the pre-condition survey identifies that measures should be put in place to protect and maintain the road surface, the Local Highway Authorities (LHAs) will be consulted ahead of works being undertaken. **Chapter 16: Transport and Access** of the ES **[APP-047]** includes a detailed assessment of the potential construction traffic impacts associated with the Scheme in terms of severance of communities, road vehicle driver and passenger delay, non-motorised user delay, non-motorised amenity, fear and intimidation on and by road users, road user and pedestrian safety and hazardous/large loads. Potential impacts due to road traffic noise are set out within **Chapter 13: Noise and Vibration** of the ES **[AS-006]**. Cumulative effects and interactions between the Scheme and other solar DCOs within the surrounding area are assessed in **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**. This includes detailed analysis of the potential cumulative traffic and transport effects of the NSIP schemes.	Not agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				The ES recognises that some significant adverse effects may arise due to construction traffic on the B1241, North of Fleets Road as a result of severance, pedestrian delay and changes in non-motorised user amenity due to the extremely low existing traffic flows. However, these effects would only occur during construction and would be short term and temporary. With regards to the construction traffic numbers, the Applicant confirms that the transport assessment has been based on the referenced numbers for the Principal Site and the Cable Route Corridor. These estimates are considered to be conservative and represent a worst-case assessment.		
1.21	Cumulative impact of the Scheme	**Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP3-031, APP-216 to APP-217]**. **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**. **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]**	Because of the unprecedented nature of this development and the significant impact on the area and communities, the four NSIP solar projects should be considered together by the Planning Inspectorate, i.e. Cottam Solar Project, West Burton Solar Project, Gate Burton Energy and the Tillbridge Solar Project. Table 2.1 of the Joint Report on the Interrelationship with other Nationally Significant Infrastructure Projects [APP-215] indicates Predicted end of construction and Predicted Operation Dates. Based upon our professional experience and the latest approved Grid Connection dates as published by NESO on 24th November 2024 we have prepared typical comparison schedules for the four NSIP projects in the area. These result in different schedules and completion dates from those included in the joint report. Please investigate and advise why you believe your dates to be most reflective of attainment.	The assessment of cumulative impacts of the Scheme with other developments in the locality is set out in **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**. The Scheme and other solar DCOs have worked collaboratively during design development and environmental assessments, including identification of a shared Cable Route Corridor, sharing baseline environment information and identification of shared mitigation measures. Further information on cumulative effects, mitigation and the approach taken to coordinate with the other solar DCOs is also provided in the **Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP3-031, APP-216 to APP-217]**. The cumulative effects and inter-relationship of each project (Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project and the Tillbridge Solar Project) has been considered within each Environmental Statement and through the **Joint Report on**	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				**Interrelationships between Nationally Significant Infrastructure Projects** that was submitted as evidence into each examination of the other solar projects. In view of the above, all four projects have considered the impact of each project in combination with the other. The Secretary of State, in granting development consent for both the Gate Burton Energy Park [EN010131] and the Cottam Solar Project [EN010133] confirmed that the Applicant's had adequately assessed the likely significant effects of the Proposed Developments cumulatively with the other planned developments. In reaching a decision on the Tillbridge Solar Project, the Secretary of State has sufficient information to consider cumulative effects of the Scheme in combination with the other solar DCOs. The Applicant has provided an updated cumulative construction programme based on the grid connection dates included within the NESO's TEC Register dated 11 February 2025 (Ref. 14) within the **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]** under Q2.5.3. The dates remain indicative and subject to change. However, the assessment presented within **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]** remains valid, as it has considered a scenario where the peak construction of all of the schemes overlaps and a total cumulative construction period of 5 years, which is not exceeded with the updated cumulative construction programme.		
1.25	Pressure on Land Use.	**Chapter 4: Alternatives and Design** of the ES **[APP-035]** **Chapter 15: Soils and Agriculture** of the ES **[APP-046]**	Many planning requirements call for effective land use, the re-use of brownfield sites and avoiding BMV crop land. The Tillbridge Solar Project uses no brownfield sites. Given the limited contribution to decarbonisation and the adverse consequences arising from using farmland at this scale, the Tillbridge Solar Project represents a grossly inefficient use of land in the face of ever-increasing pressures on its use.	The Applicant has set out its rationale for selecting the Principal Site and Cable Route Corridor in **Chapter 4: Alternatives and Design Evolution** of the ES **[APP-035]**. This explains the stages and the main considerations which have influenced the Applicant in how it has selected the	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
		Figure 15-1: Principal Site Agricultural Land Classification Distribution of the ES **[APP-192]** **Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 2 [REP4-045]** **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]**	The applicant has explained the logic of why the site was selected, but not addressed the issues of land use impact. The choice of ground-mounted solar at this scale puts additional pressure on land use – nationally and elsewhere, by displacing demand for crops required for food or biofuels. The pressures on land use are many and plentiful – including the need to plant trees and restore peatlands to aid decarbonisation. The UK is already "overcommitted" on land use, and therefore we should be confident that it can genuinely "afford" to commit large swathes of land for solar, when many other demands remain unresolved. The consequences of cumulative development have not been considered in terms of land-use pressures. The wholesale rush for ground-mounted solar is completely out of control, and has led to a pipeline of over 150GW of such development in National Grid's queue for grid connections, with the potential to cover an area larger than Greater Manchester with solar panels. No doubt developers will say that not all these schemes will be built, but each developer says their scheme is "essential"… go figure? All this land demand for solar development is putting pressure on land, planning processes, skilled resources and communities. See detailed comments in REP2-022, REP2-028, and REP2-029.	land for the Scheme. For the Principal Site, this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as network connection; topography; field pattern and arrangement; land use conflict, as well as land availability. In accordance with NPS EN-1 paragraph 5.11.3 (Ref. 2) and NPS EN-3 paragraph 3.10.14 (Ref. 3), the Applicant considered the availability of brownfield land within the range of the point of connection. The brownfield land that was identified was less than 5ha in size or already allocated for other uses within the adopted or emerging local plan at the time of the search. Therefore, it was concluded that there was insufficient, suitable brownfield land for the Scheme. The Applicant has also taken a sequential approach to the use of agricultural land considering whether land of lower quality / grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Cottam Substation, the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The Scheme is located primarily on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Principal Site, 95.5% of the land used is non BMV land. Further information on baseline agricultural land conditions is provided within **Chapter 15: Soils and Agriculture** of the ES **[APP-046]**. The Applicant has provided further information on the efficiency of land use within the **Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 2 [REP4-045]** (pages 24		

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				to 27) and the **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]** under Q2.1.6.		

4. Remaining Areas of Discussion between the Parties

4.1.1 **Table 4-1** summarises the remaining matters raised in 7000 Acres Group's relevant representation [RR-001], the Applicant's position and the status of discussion for each of these matters. **Table 4-2** summarises the specific actions that 7000 Acres Group and the Applicant have agreed to review, in order to progress matters that are under discussion.

Table 4-1 Remaining Areas of Discussion with 7000 Acres Group

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
1.3	Visual impacts	**Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]** **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]** **Framework LEMP [EN010142/APP/7.17(Rev05)]** **Written Summary of Oral Submissions to the ISH3 [REP4-049]** **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35**	The proposed Tillbridge Solar Project would have a significant impact on visual amenity in its own right. The combined effect of four large solar farms in one area of Lincolnshire would be overwhelming; solar arrays would become a devastating, dominating feature of our landscape. The Applicant does not take a true account of the cumulative impact. Their assessment only takes account of the Cottam scheme as they state the other schemes cannot be seen from the Tillbridge scheme. This is only taking account of the concurrent impact, i.e. can two schemes be seen from the same viewing point. It takes no account of the regional impact of the four schemes in West Lindsay, Steeple and One Earth projects also located in the region. Applying the Applicant's flawed logic, the whole of the UK could be covered in solar panels and yet there would be no cumulative impact, as they could not be seen from the Tillbridge Scheme! See detailed comments in REP2-018	The Applicant acknowledges that significant adverse landscape and visual effects of the Scheme (including cumulative) will arise, as presented in **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]** and **Chapter 18: Cumulative Effects and Interactions [EN010142/APP/6.1(Rev03)]** of the ES. Significant effects are likely from large-scale infrastructure projects (as recognised in NPS-EN-1) and require weighing in the planning balance against benefits of the Scheme. Whilst the Applicant acknowledges that significant operational (Year 15) cumulative landscape effects will arise for Local Landscape Character Area LLCA 3A Till Vale and a small number of representative viewpoints, the design of the Scheme has sought to limit these effects as far as practicable. The design has sought to limit significant visual effects through undeveloped set-backs and woodland/hedge planting. Although significant landscape effects remain, these should be considered against the inclusion of extensive areas for biodiversity enhancement through the Principal Site. With reference to cumulative effects, mitigation includes the provision of an ecological buffer to panels within the Cottam Solar Project to the south; and a minimum of approximately 450 m separation through undeveloped land with no public access to panels within the Cottam Solar Project to the north. Intervisibility with the Gate Burton and West Burton projects is limited by spatial separation, with distance from panels within the Principal Site being approximately 4.5 km and 7.5 km respectively. At Year 15 of operation and when planting is sufficiently mature, intervisibility of the Scheme	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				with other developments will largely be limited to the elevated representative viewpoints along the Cliff, with visual receptors on the lower-lying Till Vale being subject to screening through provision of mitigation planting as outlined in the **Framework LEMP [EN010142/APP/7.17(Rev05)]**. The Applicant has provided further information on the assessment of sequential views of cumulative schemes on pages 15 to 16 of its **Written Summary of Oral Submissions to the ISH3 [REP4-049]** and the **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]** under Q2.9.5. In summary, the Applicant accepts that sequential views of cumulative schemes will be available, however, relief from sequential views will be provided given the travel time between the schemes and the mitigation planting proposed. Following the establishment of mitigation planting, significant sequential cumulative visual effects would relate to the open views from Middle Street.		
1.4	Failure to mitigate loss of employment and livelihoods.	**Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]** **Framework Skills, Supply Chain and Employment Plan [APP-232]** **Applicant's Response to Examining Authority's First Written Questions [REP3-062]**	The Tillbridge Solar Project fails to describe how proposed development could mitigate the harm through loss of employment and livelihoods caused by the development or contribute to local planning policies and actions to remedy the underlying socio-economic situation. The Applicant's assessment does not take account of the whole supply chain supporting the agricultural industry, it only takes account of direct employment destroyed. Unless Opportunity 4, 5 and 6 are secured in the dDCO they should carry no weight in determining any benefits of the scheme. See detailed comments in REP2-021	As set out in **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]**, in the operational phase, an estimated 11 net additional jobs will be created by the Scheme, and the Principal Site currently supports 11 net jobs through agricultural activities. The total net employment effect is zero jobs in the operational phase as a result, meaning that employment lost is offset by employment gained. In the construction and decommissioning phases, the impact of employment generation on the local economy has been assessed to be a minor beneficial (not significant) effect at the local scale. Employment calculations in **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]** consider displacement, indirect and induced employment in addition to the impact of direct employment. Further information on this was also provided within the **Applicant's**	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				Response to Examining Authority's First Written Questions [REP3-062] under Q1.11.12. The **Framework Skills, Supply Chain and Employment Plan** (FSSCEP) **[APP-232]**, submitted as part of the Application, would, once implemented post-consent, deliver additional positive outcomes in terms of employment. This includes the Applicant seeking to maximise opportunities for investing in skills locally, local supply chain and businesses that can support the development of the Scheme and other solar projects in the area. With specific regard to the Scheme's supply chain, the **FSSCEP [APP-232]** highlights the following opportunities: • Opportunity 4 - The Applicant would investigate measures to promote take up of jobs generated by the Scheme by local people. The starting point will be engagement with Local Authorities and Job Centre Plus, in order to tap into existing local employment support networks. • Opportunity 5 - The Applicant would introduce initiatives to maximise the diversity of the workforce. This measure could relate to a variety of demographic or disadvantaged groups. The most appropriate target group(s) could be identified through consultation and research post-consent. • Opportunity 6 – maximising opportunities for local businesses for purchasing and contracts arising from the Scheme. Requirement 19 of the **draft DCO [EN010142/APP/3.1(Rev06)]** requires for a skills, supply chain and employment plan, which is in substantial accordance with the **FSSCEP [APP-232]**, to be submitted and approved by the relevant planning authority prior to the commencement of the development.		
1.5	Inadequate Public Consultation.	**Consultation Report [APP-021]** and its appendices **[APP-022 to APP-030]**.	The Public Consultation was insufficient/inadequate. Information was lacking and misleading. In practice, levels of comprehension of information are limited. Therefore,	The Applicant adopted a two-stage approach to its pre-application consultation. This consisted of an initial non-statutory consultation exercise which informed the development of the	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
			those affected have been unable to gain understanding of the proposals. See detailed comments in PDA-003	Scheme, followed by a continued period of non-statutory engagement leading up to a second stage of consultation - statutory consultation - which was delivered in accordance with the requirements of the Planning Act 2008 (PA 2008) (Ref. 1). The Applicant carried out the statutory consultation in accordance with its obligations set out in the PA 2008, with the Applicant's approach to statutory consultation being consulted on prior to consultation via the Statement of Community Consultation as required by section 47 of the PA 2008 and Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations') (Ref. 4). The Applicant consulted at an appropriate time in the Scheme's development and set out its current proposals and the aspects upon which it was seeking feedback. The Applicant believes that the consultation materials were of a good quality and of suitable detail to enable consultees to provide feedback on the Scheme proposals at multiple points in the development of the Scheme design. Further information on the Applicant's approach to consultation and details of its consultation materials can be found in the **Consultation Report [APP-021]** and its appendices **[APP-022 to APP-030]**.		
1.6	Opposition from local Parishes & Councils.	**The Applicants Response to Relevant Representations [REP1-028]** **SoCG with Lincolnshire County Council [EN010142/APP/9.9(Rev02)]** **SoCG with West Lindsey District Council [EN010142/APP/9.8(Rev03)]** **SoCG with Nottinghamshire County Council [EN010142/APP/9.1(Rev03)]** **SoCG with Bassetlaw District Council [REP3-053]**	All local Parish Councils and Meetings that have expressed a view to date are opposed to the proposed developments. Development at this scale, against the express wishes of local councils and their communities is undemocratic.	The Secretary of State for Energy Security and Net Zero will weigh the benefits and disbenefits of the Scheme and decide on whether development consent should be granted, whilst taking into account representations submitted by interested parties during the examination process. The Applicant's engagement through meetings with Parish Councils during the pre-application stage is summarised within the **Consultation Report [APP-021]**. The Applicant's responses to the relevant representations received from Parish Councils are provided within **Table 1-3** of **The Applicant's Response to Relevant Representations [REP1-028]**. The Applicant's	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				responses to relevant representations received from local authorities are provided within **Table 1-2** of **The Applicants Response to Relevant Representations [REP1-028]**. Furthermore, the Applicant is in the process of developing Statements of Common Ground with the local authorities.		
1.7	No consideration for community benefit.	**Framework Skills, Supply Chain and Employment Plan [APP-232]** **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]** **Chapter 15: Soils and Agriculture** of the ES **[APP-046]** **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]**	The Tillbridge Solar Project will provide power to the National Grid rather than local homes. It will displace agricultural jobs, provide few employment opportunities, and reduce local amenity, providing nothing in return. No community benefits have been secured in the dDCO and so no weight should be given to these vague promises. See detailed submissions in REP2-021, REP2-023, REP2-029, and REP2-032.	The Applicant has engaged with both the Lincolnshire and Nottinghamshire community foundations and, should the Scheme receive development consent, the Applicant would provide a community benefit package. The Applicant has provided further information on the operation of the fund under the **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]** under Q2.1.3. The Scheme also stands to contribute towards the local economy and supply chain, this includes through the provision of jobs (both directly and indirectly) in the local area. The Applicant has considered a series of measures designed to maximise such local benefits. Further detail is provided in the **Framework Skills, Supply Chain and Employment Plan** (FSSCEP) **[APP-232]** (secured through Requirement 19 of the **draft DCO [EN010142/APP/3.1(Rev06)]**). Applicant's position with regards to agricultural displacement and loss of employment is set out under Ref 1.2 and 1.4. In addition, the Scheme will deliver ecological enhancements, improvements to soil quality; and improvements to the existing Public Rights of Way (PRoW) network through the provision of permissive paths (secured through Work No. 6 and 9 in Schedule 1 and Requirements 7 and 8 in Schedule 2 of the **draft DCO [EN010142/APP/3.1(Rev06)]**). Furthermore, **Chapter 11: Human Health** of the ES **[APP-042]** identifies beneficial impacts on communities in relation to the following: • Employment and income, due to the creation of 138 jobs in the local area, equating to £7.9	Not Agreed	Medium

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				million Gross Value Added (GVA) generated within West Lindsey and Bassetlaw districts, • Prioritisation of walking and cycling routes, through the provision of new permissive paths connecting Common Lane to Northlands Road and Common Lane to Kexby Road, offering recreational access in an area where PRoW are limited and also improving north-south off-road links; and • Climate change, through a substantial emissions reduction relative to the without-Scheme baseline.		
1.8	Impact on communities and populations.	**Framework Skills Supply Chain and Employment Plan [APP-232]** **Chapter 11: Human Health** of the ES **[APP-042]** **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]**	Many small villages surrounded by the Tillbridge Solar Project have few opportunities for employment and very few amenities other than the open countryside landscape that it sits in. The scale of the Tillbridge Solar Project would rob villages of this key attribute and erode the attractiveness of villages, driving some people away and serving to deter people from moving in, therefore reducing their capacity to sustain communities and populations. The Applicant's assessment does not take account of the regional impact of this and the other solar industrial schemes in the area. See detailed submissions in REP2-021, REP2-023, REP2-029, and REP2-032.	The Applicant recognises that the operation of the Scheme will result in a residual significant adverse effect upon a small number of visual receptors, as presented in **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]**. The Applicant has carefully designed the Scheme in consultation with stakeholders to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design which increases connectivity and local access through the landscape, with the inclusion of buffers from sensitive features and properties and the creation of new green infrastructure to provide screening and enhance the landscape condition. **Chapter 11: Human Health** of the ES **[APP-042]** identifies minor beneficial impacts on communities in relation to the following: • Employment and income, due to the creation of 138 jobs in the local area, equating to £7.9 million Gross Value Added (GVA) generated within West Lindsey and Bassetlaw districts, • Prioritisation of walking and cycling routes, through the provision of new permissive paths connecting Common Lane to Northlands Road and Common Lane to Kexby Road, offering recreational access in an area where PRoW are limited and also improving north-south off-road links; and • Climate change, through a substantial emissions reduction relative to the without-Scheme baseline.	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				The **Framework Skills, Supply Chain and Employment Plan** (FSSCEP) **[APP-232]**, would, once implemented post-consent, deliver additional positive outcomes to the jobs required to construct the Scheme. This includes the Applicant seeking to maximise opportunities for investing in local supply chain and businesses that can support the development of the Scheme and other solar projects in the area.		
1.9	Separation of communities in an industrial landscape.	**Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]** **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]** **Written Summary of Oral Submissions to the ISH3 [REP4-049]** **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35**	The vast area of development proposed for the Tillbridge Solar Project is many orders of magnitude larger than any of the neighbouring villages, i.e. Glentworth, Hemswell, Springthorpe, Sturgate, Heapham Marton, Brampton, Sturton-by-Stow and Saxilby. This is compounded by there being 4 schemes within a close area, (which in total exceeds that of the City of Lincoln and its suburbs together with the town of Gainsborough) and would partition the countryside, segregating rural villages and placing them in an industrialised landscape. The Applicant's assessment takes no account of the regional impact that this and the other solar NSIPs in the area will have on local residents and amenities. See detailed submissions in REP2-018, REP2-023, REP2-030, REP2-031, REP2-032, and REP2-034.	The Applicant acknowledges that significant residual landscape and visual effects will arise from the Scheme both in isolation and cumulatively; and that elements of the Scheme will result in the presence of industrial features with a corresponding change in character, as set out in **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]** and **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**. However, the design of the Scheme includes set-backs from villages and other sensitive features such as open space at Harpswell; and does not feature solar infrastructure adjacent to any existing PRoW through the Principal Site. It is accepted that rural lanes are of recreational value around villages, but the Scheme design has sought to reduce visual effects along these lanes through the provision of new hedgerows, woodland belts, undeveloped set-backs and areas for biodiversity enhancement. Two new permissive paths—also with screening through planting—will be created, increasing north-south recreational opportunities within the Principal Site. With reference to cumulative effects and the nearest part of the Cottam Solar Project to the south, fields have been identified for ecological enhancement in order to provide an undeveloped, habitat-rich buffer. The Applicant has provided further information on cumulative landscape character effects and the assessment of sequential views of cumulative schemes on pages 15 to 16 of its **Written Summary of Oral Submissions to the**	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				ISH3 [REP4-049] and the **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]** under Q2.9.4 and Q2.9.5. In summary, the Applicant accepts that sequential views of cumulative schemes will be available, however, relief from sequential views will be provided given the travel time between the schemes and the mitigation planting proposed. Following the establishment of mitigation planting, significant sequential cumulative visual effects would relate to the open views from Middle Street.		
1.10	Property blight.	n/a	The Consent Order should ensure that the potential for properties and communities to be affected by blight is properly considered and potential remedies are available. Extensive industrialisation of the region by solar development at the scale of the Tillbridge Solar Project, with the associated reduction of green amenity space, employment opportunities and other harms, is likely to severely reduce the desirability of the region as a place to live (with a dramatic reduction in property value).	In terms of property value, impacts on property prices are not a material consideration under section 104 of the Planning Act 2008 (Ref. 1), which sets out the matters the Secretary of State must have regard to, which includes the relevant National Policy Statements (NPS), which in this case are NPS EN-1, NPS EN-3 and NPS EN-5 (Ref. 2,Ref. 3,Ref. 6). None of these policy documents consider property prices, and it therefore should not be a factor which is considered by the Secretary of State when determining the Application for development consent. As noted in the response to Ref 1.9 above, the Scheme has been designed to limit landscape and visual effects on properties and communities, including through the use of early-stage consultation with residents to determine the extent of mitigation. The Scheme will not result in any loss of accessible green amenity space and will include the two new permissive paths, as stated above.	Not Agreed	Low
1.11	Inadequate landscape mitigation / screening	**Outline Design Principles Statement [REP4-020]** **Framework LEMP [EN010142/APP/7.17(Rev 05)]** **Figure 12-14** of the ES **[APP-187]**	The Tillbridge Solar Project proposes solar panels which would have a height of 2.5m as well as extensive security fencing. At that height, the character of the land would undoubtedly be dominated by solar panels, which could not be adequately screened by hedgerows (at all) or by trees (for many years). The developer proposes to re-evaluate landscape and visual effects periodically, post-construction, but it is not clear to what standard the developer must achieve with regard to mitigation, nor the consequences or remediation	As set out in the **Outline Design Principles Statement [REP4-020]** the proposed deer fencing along the outer boundaries of the Principal Site will be maximum 2.5m in height and comprise timber posts and agricultural wire. The appearance of this is not considered to accord with typical 'security' fencing: such fencing (e.g. steel palisade) will only be located around critical infrastructure within the substations.	Not Agreed	Low

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			requirements should this not be achieved. Monitoring at 3 years would be inadequate, given the potential for plant losses in early months/years. Long-term re-assessment (e.g. at 10 years) represents a significant proportion of people's lives, should mitigation not be effective. See detailed submissions in REP2-018, REP2-023, REP2-030, REP2-031, REP2-032, and REP2-034.	Hedges will be managed at between 2.5 and 3 metres height, as described in the **Framework LEMP [EN010142/APP/7.17(Rev 05)]**. Taller heights will be prescribed alongside routes such as roads through the Principal Site; details such as this will be confirmed through the final LEMP. The effect of a 2m high hedge is demonstrated in the representative viewpoint 17 (**Figure 12-14** of the ES **[APP-187]**) (Common Lane), where the existing minimum circa 2m high hedge is considered sufficient to screen the solar infrastructure, even during the winter months (refer to **Figure 12-14** of the ES **[APP-187]**). Although the Applicant acknowledges that significant residual visual effects will arise where views are available from elevated locations on the Cliff, it is considered that for the hedge heights proposed, mitigation (when managed at the heights stated above) from locations at lower elevations west of the Cliff will limit views. All management measures, including those that ensure that mitigation is successful, such as monitoring, are outlined within the **Framework LEMP [EN010142/APP/7.17(Rev05)]**. These will be reviewed and agreed through consultation with stakeholders prior to being formalised in the final LEMP. Monitoring of all proposed and existing planting will be undertaken by the appointed Landscape Clerk of Works. As stated in the **Framework LEMP [EN010142/APP/7.17(Rev 05)]**, this will be on an quarterly basis for the first 5 years, at a minimum of 2 visits per year until year 10 and then a minimum of 1 visit per year until the end of the operational life of the Scheme. Further monitoring will be provided by the Ecological Clerk of Works in respect of ecological mitigation measures. Any changes to these frequencies and timescales, along with standards of monitoring and maintenance, will need to be approved by the Local Planning Authority prior to the preparation of the detailed LEMP. Monitoring will inform any required changes to management prescriptions and further remedial		

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				actions that may be required within the LEMP. This will include the selection of appropriate species that are observed to establish more rapidly than any that do not show predicted growths, as part of the replacement of failed plants.		
1.12	Impacts on cultural heritage and archaeology	**Chapter 8: Cultural Heritage [APP-039]** **Archaeological Mitigation Strategy [REP1-025]** **SoCG with Historic England [REP1-032]** **SoCG with Lincolnshire County Council [EN010142/APP/9.9(Rev02)]** **Cultural Heritage Desk-Based Assessment (DBA) (Appendix 8-2 [APP-059])**	The area in which the Tillbridge Solar Development is proposed is dotted with rural historic parishes, within which many historic buildings remain, including several dating as far back as the Domesday Book. The impact of the proposed scheme to heritage and such cultural assets has not been adequately explored or mitigated. See detailed comments in REP2-018	The Applicant has prepared a **Cultural Heritage Desk-Based Assessment (DBA)** (**Appendix 8-2** of the ES **[APP-059]**) to assess the baseline cultural heritage resource and archaeological potential of the area within the Order limits. The DBA identifies all known designated and non-designated heritage assets within the Order limits and the surrounding area, assesses the potential for previously unrecorded buried archaeological remains to exist within the Order limits and reviews the significance of the heritage assets with the potential to be affected by the Scheme. An assessment of likely significant effects on heritage assets is provided within **Chapter 8: Cultural Heritage** of the ES **[APP-039]**. In addition, the Applicant submitted an **Archaeological Mitigation Strategy [REP1-025]** at Deadline 1. The Applicant has had close engagement with Historic England and the historic environment officers of Lincolnshire County Council on the effects of the Scheme on heritage assets and as part of the development of the **Archaeological Mitigation Strategy [REP1-025]**. The Applicant has submitted an **SoCG with Historic England [REP1-032]** and an **SoCG with Lincolnshire County Council [EN010142/APP/9.9(Rev02)]**, which track matters of discussion on the heritage assessment and proposed mitigation.	Not Agreed	Low
1.14	Food security.	**Chapter 14: Socio-economics and Land Use [APP-045]** **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**.	The land proposed to be developed for the Tillbridge Solar Project is productive arable land, as is the land associated with the three other large solar developments in the region. The impact of the Tillbridge Solar Project, and the cumulative impact of the 4 schemes on Food Security has not been considered, particularly in light of the circumstances of war, pandemic, crop disease and global	The effect of the Scheme on agricultural land with regards to food production has been considered in Section 14.8 (Assessment of Likely Impacts and Effects) in **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]**. There are no likely significant effects across the construction, operational and	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
		Applicant's Response to Examining Authority's First Written Questions [REP3-062] **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 [REP4-045**],	warming (e.g. rising sea levels, which are predicted to inundate 30% of Lincolnshire's productive farmland by 2050) on national and global supply chains. The broad impacts of the loss of agricultural land have been highlighted by the House of Commons Environmental Audit Committee Report (29th November 2023) (Ref. 5). The use of percentage calculations using Lincolnshire is not reflective on the detrimental effect on Food Security nationally. With the significant reduction in wheat production around the world then every acre of UK farmland is required to make up a small proportion of the lost crop production.	decommissioning phases with regards to food production, considering that the Scheme area forms less than 1% of agricultural land available in Lincolnshire and that following decommissioning, the agricultural land within the Scheme can revert back to arable management. The change of use from predominantly intensive arable farming to semi-improved grassland across the Order limits will be beneficial to the structure and quality of soils, making it suitable for reversion to agricultural use. The cumulative assessment of impacts on food production is set out within Section 18.15 of **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**. Alongside the other solar DCOs (Gate Burton Energy Park, West Burton Solar Project, Cottam Solar Project) and those other land use developments set out in **Table 18-22** of **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)],** the cumulative land take would be up to 2.2% of all agricultural land in Lincolnshire. As such, the cumulative impacts on agricultural land represent a very small proportion of the total agricultural land in Lincolnshire, and are not considered to be significant. The House of Commons Environmental Audit Committee report referred to in RR-001 (being the Environmental Change and Food Security: second report of session 2923-04, 29 November 2023)(Ref. 5) does not cite solar farms on agricultural land as a threat to UK food security. Page 16 of the report notes three overarching pillars to the committee findings. These are: "*We need to adapt our food and farming system to become more resilient to the effects of climate change and biodiversity loss*." "*We must mitigate the impacts of climate change and biodiversity loss on our food system*."		

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				"*We must mitigate the damage to the environment that aspects of our food system cause*." The Applicant also provided further information on this matter as part of the **Applicant's Response to Examining Authority's First Written Questions [REP3-062]** under Q1.12.3 and the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 [REP4-045]**, pages 13-16.		
1.15	Existing land productivity.	**Chapter 7: Climate Change** of the ES **[APP-038]**	Regardless of Agricultural Land Classification, the proposed area covered by the Tillbridge Solar Project is productive agricultural land, producing food for people and animals, as well as biofuels. The overall sustainability impact of displacing this production has not been considered, in terms of what production will be lost and the additional food miles and carbon impact of production being required elsewhere. In **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]** (see 1.14 above) you quote that the Scheme area forms less than 1% of agricultural land available in Lincolnshire, not the 0.25% stated in your earlier response. Within **Chapter 7: Climate Change** of the ES **[APP-038],** Land Use Change 7.3.21 states that an assessment of GHG impacts from land use change associated with the conversion of arable land to grassland has been omitted from this chapter. Though land use change due to the Scheme is anticipated to have an overall net positive GHG impact, due to the higher carbon sequestration value of grassland in comparison to cropland, it is expected that the land will return to its original use upon decommissioning of the Scheme, with any carbon stored in soil or vegetation re-released to the atmosphere. The beneficial GHG impact from land use change is therefore considered to only be temporary (approximately 60 years) and has therefore been excluded from the lifecycle GHG impact assessment. However your assessment goes on to consider GHG savings against three criteria namely Construction Phase, Operation Phase and Decommissioning Phase and so it should not have been excluded	The Scheme would require the repurposing of 1,212 ha of agricultural land, which equates to approximately 0.25% of the total agricultural land within Lincolnshire. This is less than 1% of the total agricultural land within Lincolnshire. The carbon saving realised by the operation of the Scheme, as detailed in the greenhouse gas (GHG) impact assessment within Section 7.8 of **Chapter 7: Climate Change** of the ES **[APP-038]**, is likely to significantly outweigh any increase in food transportation emissions (were a material increase to occur as a result of the Scheme, which the Applicant does not consider it will), especially with a view to the decarbonising of the transport sector. While any potential increase to food transportation emissions have not specifically been quantified within the GHG impact assessment of the Scheme, it is considered the impact will be minimal and not significant. It should also be noted that combinable crops are unlikely to be marketed and consumed within a local area or even a region of England. The UK both imports and exports wheat in most years. There is therefore likely to be no discernible effect of the proposed solar farm on food miles of arable crops. For such an effect to occur grain would need to be processed at a local mill for sale in local outlets, where any tonnage concerned would be marginal. Regardless, lamb fattened by grazing in the solar farm could be butchered and marketed locally.	Not Agreed	Low

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1.16	Impact on wildlife.	**Draft DCO [EN010142/APP/3.1(Rev06)]** **Framework LEMP [EN010142/APP/7.17(Rev05)]** **Biodiversity Net Gain Report [AS-062]** **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]** **Appendices 9-1 to 9-12** of the ES **[APP-081 to APP-084, APP-086 to APP-093, AS-012, REP3-006]**	The details provided by the developer to date do not provide a thorough assessment of the potential harm to the ecology and biodiversity of the area, for example damage and disruption during construction, or noise during operation. In addition, Solar farm biodiversity net gain claims are unproven in the UK at this scale. See detailed comments in REP2-023	The Applicant has undertaken detailed ecological surveys to understand the habitats and species present. Full details of these surveys are provided in **Table 9-11** of **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]**, with further details set out in **Appendices 9-1 to 9-12** of the ES **[APP-081 to APP-084, APP-086 to APP-093, AS-012, REP3-006].** A detailed assessment of the potential impacts of the Scheme on biodiversity is presented in **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]**, with particular reference to **Tables 9-14 and 9-15**. This includes loss, damage and degradation of habitats and displacement and disturbance to species during construction, where relevant. It also includes consideration and assessment, where appropriate, of operational noise sources. The Applicant has carefully designed the Scheme to avoid or minimise adverse effects to biodiversity, with substantial mitigation measures embedded and detailed in **Table 9-13** of **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]**. The assessment concludes that there will be no significant adverse effects on biodiversity, with significant beneficial effects to a variety of habitats as a result of the landscape proposals introduced by the Scheme, including broad-leaved woodland, running water, hedgerows and species, including breeding birds, particularly farmland birds associated with hedgerows and field margins. As set out in the **Biodiversity Net Gain Report [AS-062],** the Scheme is predicted to deliver a net gain of 64.44% for area-based habitat units, 17.28% for hedgerow units, and 22.94% for watercourse units. The Applicant has committed to achieving this level of BNG through the Scheme, as secured by both requirements 7 (landscape and ecological management plan) and 8 (biodiversity net gain) of Schedule 2 of the **Draft DCO [EN010142/APP/3.1(Rev06)]**. Requirement 8 provides that construction cannot commence until a BNG strategy has	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				been submitted and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body (being Natural England). The BNG strategy must be substantially in accordance with the **Framework LEMP [EN010142/APP/7.17(Rev05)]**, which states at paragraph 4.6.2 that the Applicant is committed to achieving BNG in accordance with the terms of the **Biodiversity Net Gain Report [AS-062]**.		
1.17	Nature of the Scheme is not truly temporary.	**Draft DCO [EN010142/APP/3.1(Rev 06)]**	An operational period of 60 years, plus an additional decade construction and decommissioning, would result in a life-cycle of the development of around 70 years - which could never be classed as temporary.	The **Draft DCO [EN010142/APP/3.1(Rev 06)]** applies for a time-limited consent as set out within Schedule 2, Requirement 20. As such, the Scheme cannot continue indefinitely and is therefore temporary. The Scheme is also reversible after its lifetime and in that respect is a long term, temporary use. The temporary and reversible nature of a solar NSIP with 60 year consent has also been acknowledged in the Secretary of State's decisions on Gate Burton Energy Park and Cottam Solar Project, which have both been approved. NPS EN-3 also supports this position at paragraph 2.10.66 which states that: *"time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed."*	Not Agreed	Low
1.18	Scale of effects.	ES **[APP-031 to APP-208]** **Environmental Mitigation and Commitments Register [REP3-020]**.	The project design fails to consider or mitigate the impact of the huge area of the Tillbridge Solar Project, which dwarfs the neighbouring villages. See detailed comments in REP2-018, REP2-021, REP2-023, REP2-030, REP2-031, REP2-032, and REP2-034.	The Applicant has undertaken an Environmental Impact Assessment (EIA) of the Scheme, which is reported within the ES **[APP-031 to APP-208]** submitted with the Application. The ES provides an assessment of the effects of the Scheme on sensitive environmental receptors and resources and outlines mitigation proposed to avoid, minimise, restore and offset any impacts of the Scheme. All mitigation proposed is summarised within the **Environmental Mitigation and Commitments Register [REP3-020]**. With respect to the relationship between the Scheme and adjacent villages, the design has	Not Agreed	Low

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				been amended throughout the Application process. This has included the withdrawal of the Order limits and solar panel areas further west from Harpswell and Glentworth; and east from Springthorpe. The provision of new hedgerows and woodland belts, along with undeveloped areas for biodiversity mitigation and enhancement, is intended to further limit landscape and visual effects from locations and areas close to these settlements.		
1.19	Lost appeal for visitors / tourism / new people	**Planning Inspectorate's EIA Scoping Opinion [APP-052]** **Chapter 8: Cultural Heritage** of the ES **[APP-039]** **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]** **Appendix D: Tourism Assessment** of the **Applicant's Responses to Local Impact Reports [REP3-061]**	Development at the scale of the Tillbridge Solar Project would alter the character and appeal of the region to attract visitors, tourists, or new people to the region, particularly when considered in the context of the 4 proposed large solar developments. The development would form part of a solar complex that would be clearly visible from historic buildings, such as Lincoln Castle. The project has failed to assess the potential impact of the development in this important regard. See detailed comments in REP2-021.	The Principal Site is not located within an area adjacent to visitor attractions and as such, the Scheme is not considered to impact on tourism. It is also noted that the **Planning Inspectorate's EIA Scoping Opinion [APP-052]** did not identify that such an assessment was required. **Chapter 8: Cultural Heritage** of the ES **[APP-039]** provides an assessment of effects of the Scheme on designated and non-designated heritage assets and their setting, as well as setting out mitigation measures. Lincoln Castle is located over 9.5km south of the Principal Site and the Scheme would not be visible from this location. Regarding effects on local amenity, **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]** assesses the impact of the Scheme on local land use and amenity. The assessment concludes that, taking into account the residual effect assessment results of the air quality, noise, traffic and visual assessments, there are no residents, businesses or community facilities that would be likely to experience a significant effect on their amenity during construction, operation or decommissioning from effects acting in combination. The Applicant submitted additional information on this matter within **Appendix D: Tourism Assessment** of the **Applicant's Responses to Local Impact Reports [REP3-061]**. The Appendix considers the impact of the Scheme on visitor attractions, recreation facilities and attractions and other tourism recreation receptors during all phases of the Scheme. The	Not Agreed	Low

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				assessment concludes that these effects are not significant.		
1.20	Impact on leisure and tourism.	**Framework Public Rights of Way Management Plan [REP3-041]** **Framework LEMP [EN010142/APP/7.17(Rev05)]** **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]** **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**	There is an extensive network of footpaths, bridleways and isolated rural roads within the area covered by the Tillbridge Solar Project, which are used for walking, cycling, and horse-riding. The direct impact of the Tillbridge Solar Project, and the combined impact of the 4 proposed large solar projects on leisure and recreation have not been adequately considered. See detailed comments in REP2-018, REP2-021, REP2-023, REP2-031, REP2-032 and REP2-034.	**Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]** assesses effects of the Scheme on PRoWs as a recreational resource. During construction and decommissioning, there will not be any permanent PRoW closures although some minor diversions are likely to be required to provide safe access across the Order limits whilst construction and decommissioning activities are taking place, with PRoW to be diverted or managed with a banksman (or similar). These diversions will be temporary and are expected to be short term. During the operation of the Scheme, no permanent closures or diversions to PRoWs are proposed. Permissive Paths to enhance the current PRoW network will also be provided as part of the Scheme, with one route connecting Common Lane to Kexby Road, and the second route connecting Common Lane to Northlands Road. This will offer recreational access in an area where PRoWs are limited and will also improve north-south off-road links. The Permissive Paths will be located within 25 m wide corridors that will allow sufficient space for planting such as hedgerows to screen solar infrastructure and offer biodiversity and visual interest to users. A minor beneficial effect is expected due to the provision of additional permissive pathways. The **Framework PRoW Management Plan [REP3-041]** outlines how PRoW will be managed during the construction, operation and decommissioning of the Scheme. In addition, the **Framework LEMP [EN010142/APP/7.17(Rev05)]** sets out measures to mitigate and enhance the experience of users of PRoW through the provision of buffers around PRoW to include species rich grassland, and the potential to provide orchard trees close to PRoW and permissive paths. With the implementation of the **Framework PRoW Management Plan [REP3-041]** and the	Not Agreed	Low

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				Framework LEMP [EN010142/APP/7.17(Rev05)], no significant effects on PRoW as a recreational resource have been identified within **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]** from the Scheme on its own or within Section 18.15 of **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]** cumulatively with other developments.		
1.22	Failure to consider neighbourhood plans.	**Planning Statement [REP3-027]** **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]**	The project does not consider the detailed work by communities in developing approved neighbourhood plans, including, for example aspirations for green spaces, open landscapes and the rural nature of villages. See detailed comments in REP2-018	The **Planning Statement [REP3-027]** provides an assessment of the Scheme against the relevant policies of all existing neighbourhood plans. The Scheme has been developed to address the policy considerations set out in these plans through its design, avoiding sensitive areas and limiting adverse impacts, where practicable. With regards to landscape effects specifically, **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]** includes a comprehensive review of the existing (baseline) landscape, including neighbourhood plan policies and supporting evidence base documents. These have informed the design of the Scheme, for example with reference to key views from Harpswell Hall open space and associated areas of open access; and views identified from Glentworth. As with any large-scale infrastructure project, significant landscape and visual effects have been identified (NPS-EN-1 at paragraph 5.10.13 expressly recognises that all proposed energy infrastructure is likely to have visual effects for many receptors (Ref. 2)) and it is acknowledged that screening the Scheme from Middle Street will result in the loss of views that are reflected in neighbourhood plans. Any significant landscape and visual effects require weighing in the planning balance and should be considered alongside benefits for green infrastructure such as new and enhanced planting/ecological areas that can locally benefit the landscape.	Not Agreed	Low

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1.23	Displacement of farmland.	**Statement of Need [APP-210]** **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]**	While there is a clear case for solar playing a role in decarbonisation, there is no clear case for extensive displacement of farmland through the installation of large-scale ground-mounted solar farms. See detailed comments in REP2-028	The Government has identified through its energy policy, most recently in the NPS EN-1 (Ref. 2) and NPS EN-3 (Ref. 3), that there is a critical national priority for the provision of nationally significant low carbon infrastructure in the UK. As discussed in the **Statement of Need [APP-210]**, the Applicant recognises that energy alternatives such decentralised energy generation on roof tops or brownfield land for example, which is an alternative to large scale ground mounted solar farms has an important role to play in decarbonisation. However, on their own, smaller scale solar, including rooftop solar, and solar on brownfield land are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. As set out in the **Statement of Need [APP-210]**, due to technological advances, solar facilities are already among the cheapest form of electricity generation in the UK and larger solar schemes, such as the Scheme, deliver power more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity, bringing forward carbon reduction and economic benefits in line with Government policy. The Government recognises in NPS EN-1 (Ref. 2) that growth in large scale solar schemes, alongside smaller schemes of solar or other renewable energy sources, is expected to improve the dependability of those assets as a combined portfolio, contributing to an adequate and dependable UK generation mix required to meet the UK's energy security needs, and the decarbonisation needs of the UK. Whilst rooftop/brownfield solar and other smaller scale energy schemes are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Scheme, in line with NPS EN-1 (Ref. 2).	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				The effect of the Scheme on agricultural land with regards to food production (displacement of farmland) has been considered in Section 14.8 (Assessment of Likely Impacts and Effects) in **Chapter 14: Socio-economics and Land Use** of the ES **[APP-045]**. The Scheme area forms less than 1% of agricultural land available in Lincolnshire and following operation, the land used for the Scheme can be reverted back to agricultural land.		
1.24	Failure to follow the National Policy Statements.	**Planning Statement [REP3-027]**	The proposed project has failed to follow the requirements of the National Policy Statements in a number of areas. See detailed comments in REP2-033	The relevant NPSs in respect of the Scheme are NPS EN-1 (Ref. 2), NPS EN-3 (Ref. 3) and NPS EN-5 (Ref. 6). Section 6 and Appendix A of the **Planning Statement [REP3-027]** provide an assessment of the Scheme against the NPS requirements and conclude that the Scheme is in accordance with these national policy statements.	Not Agreed	Low
1.26	Improper Agricultural Land Classification.	**SoCG with Natural England [REP3-057]** **Chapter 15: Soils and Agriculture** of the ES **[APP-046]** **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 [REP4-045]**	The group does not have confidence in the Agricultural Land Classification data published by developers following significant changes in other developers' ALC figures. Given the margin for potential changes, it is imperative that there is an independent soil analysis conducted to establish the accurate picture and to be certain of the methodology that has been followed. Aside from the sub-classification of land between 3a and 3b, there has also been debate within the Government that all grade 3 land should be included in BMV. The application of the ALC classification only is flawed as it does not consider crop yield. The data presented in the ALC report contains errors in 23% of the Observation Points as identified in our previous submission. Upon correction of these errors the ALC data needs to be re-reviewed by Tillbridge staff and Natural England. As pointed out by the applicant Natural England retains a number of ALC specialists and in this instance they should not only be commenting on the methodology applied but also on the evaluation of the data and the results presented. See detailed comments in REP2-019, REP2-021, REP2-024, REP2-027, and REP2-029.	The ALC assessment presented within **Chapter 15: Soils and Agriculture** of the ES **[APP-046]** follows Natural England guidance given in their technical information note Agricultural Land Classification: Protecting the Best and Most Versatile Land (TIN049) (Ref. 7). The assessment presented has been reviewed by Natural England, the statutory consultee on this issue, that retains a number of ALC specialists. The Applicant is in the process of developing an **SoCG with Natural England [REP3-057]**, which covers comments on the assessment presented within **Chapter 15: Soils and Agriculture** of the ES **[APP-046]**. The Applicant also provided a response to the comments raised by 7000 Acres on the soil survey within the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 [REP4-045]**, page 11.	Not Agreed	Low

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1.27	Failure to consider alternatives.	**Chapter 4: Alternatives and Design Evolution** of the ES **[APP-035]**	The proposed project fails in that reasonable alternatives have not been adequately considered, as is required by the EIA regulations and the National Policy Statements. See detailed comments in REP2-021, REP2-024, REP2-027, REP2-028, REP2-029, REP2-031, REP2-032, REP2-033 and REP2-034.	The Applicant has set out its rationale for selecting the Principal Site and Cable Route Corridor in **Chapter 4: Alternatives and Design Evolution** within the ES **[APP-035]**, in accordance with Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017 (Ref. 4) and the requirements of NPS EN-1 (Ref. 2). This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Principal Site, this consisted of a five-stage process: • Stage 1 consisted of determining the search area for a site to accommodate the Scheme defined by the available grid connection at the National Grid Cottam substation. • Stage 2 consisted of refining the search area to identify the presence/absence of key environmental and planning constraints. • At Stage 3, areas of land were identified as potentially suitable to accommodate a proposed solar development. • Stage 4 included a desktop assessment of the zones identified at Stage 3 to consider the suitability of each zone. • At Stage 5, the location of the Principal Site which forms the basis of this Application was identified. Throughout the site selection process for the Principal Site, the Applicant has sought to avoid environmental and land use constraints and taken into consideration other criteria such as network connection; topography; field pattern and arrangement; land use conflict, as well as land availability. This process has continued through the design evolution of the Scheme, which has sought to locate elements of the Scheme appropriately across the Principal Site to avoid impacts. The Cable Route Corridor has been designed in collaboration with the developers of Cottam Solar Project, Gate Burton Energy Park, and West Burton Solar Project, to derive a shared	Not Agreed	Low

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				Cable Route Corridor in order to minimise impacts through design.		
1.28	Misuse of NSIP process.	n/a	Given the load factor of solar in the UK and the intermittency of power produced – and the fact that the development would provide no power when the country would most need it on winter evenings (i.e. it could not be relied upon when needed), its status of "National Significance" or strategic importance is questionable, and it is therefore a misuse of the NSIP process to develop the project in this way. See detailed comments in REP2-028.	The Planning Act (PA) 2008 (Ref. 1) provides the legislative basis and defines the application process under which consent for NSIPs is sought. The Scheme is defined as an NSIP under Section 14(1)(a) and 15(2) of the PA 2008 as it meets the following criteria: • The Scheme comprises the construction of a generating station (Section 14(1)(a) of the PA 2008); • It would be located in England (Section 15(2)(a) of the PA 2008); • It would not generate electricity from wind (Section 15(2)(aa) of the PA 2008); • It would not be an offshore generating station (Section 15(2)(b) of the PA 2008); and • Its capacity would be more than 50 MW (Section 15(2)(c) of the PA 2008). The PA 2008 requires a DCO to be obtained for the development of NSIPs, therefore the Applicant submitted a DCO application for the Scheme in April 2024, and the Scheme was accepted for Examination by the Planning Inspectorate in May 2024. This means that the Planning Inspectorate accept that the Scheme is classed as an NSIP, in accordance with the PA 2008.	Not Agreed	Low
1.29	Failure to meet threshold to allow for compulsory purchase.	**Statement of Reasons [AS-047]**	Given the flawed arguments surrounding the potential benefits of the Tillbridge Solar Project development, as well as the failure of the developer to consider alternatives which would have fewer adverse impacts, the Tillbridge Solar Project does not meet the necessarily high threshold to allow compulsory purchase. See detailed comments in REP2-028 and REP2-032.	The **Statement of Reasons [AS-047]** sets out in detail why it is necessary, proportionate and justifiable for the Application to seek powers to acquire land compulsorily, create and compulsorily acquire new rights over land and impose restrictions, and extinguish or override existing rights over land, as well as powers to take temporary possession of land to construct and maintain the Scheme. The Applicant considers that the clear benefits provided in respect of new renewable energy generation and meeting of the Government's net zero targets meet the compelling public interest test for this acquisition. Section 5.4 within the **Statement of Reasons [AS-047]** further sets	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				out the alternatives pursued to compulsory acquisition.		
1.30	Accuracy and fullness of information provided by the developer.	**Environmental Statement [APP-031 to APP-208]** **EIA Scoping Opinion [APP-052]** **ES Addendum [AS-057]**	Supporting information provided by the developer's consultants and experts is partial and fails to objectively consider all aspects and implications of the development. See detailed comments in REP2-033	An Environmental Impact Assessment (EIA) of the Scheme has been carried out in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and is reported within the **Environmental Statement (ES) [APP-031 to APP-208]** submitted with the Application. An EIA is a systematic process that examines the potential significant effects on the environment resulting from the construction, operation and decommissioning of a development, and allows for the identification of measures to prevent, reduce or offset any adverse effects and to enhance any beneficial effects. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref. 4), regulation 14(3)(b) states that the ES must: "*include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment*;". As such, the ES is not expected to consider "all aspects and implications" of the Scheme but would focus on impacts of the Scheme that may result in significant effects. The scope of the ES, including the aspects to be covered, were consulted on with the Planning Inspectorate via the EIA Scoping process. The ES has been prepared in accordance with the Planning Inspectorate's **EIA Scoping Opinion [APP-052].** The ES **[APP-031 to APP-208]** that accompanies the Application has identified all likely significant effects associated with the Scheme and cumulatively with other developments. The preliminary conclusions of the EIA were consulted on as part of the statutory consultation process and ongoing technical engagement has been undertaken with statutory bodies to refine assessment conclusions and mitigation requirements. Where potentially significant effects have been identified, the Applicant has identified measures	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				to mitigate these impacts, as far as practicable. The ES should be read alongside the **ES Addendum [AS-057]** which the Applicant submitted in September 2024 in support of a request of changes to the Application. The Applicant considers the EIA undertaken for the Scheme as presented within the ES and ES Addendum is robust. The Planning Inspectorate, in deciding to accept the Application for examination, has not raised concerns with the adequacy of the ES provided.		
1.31	Combined land take of concentrated energy development in a single area.	**Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**	The combined impact of all solar developments in the region (NSIP and locally determined developments) would take a significantly higher proportion of land locally than the national average figure quoted by solar developers to illustrate how little land would be used by solar, thus the impact on the region would be disproportionate. See detailed comments in REP2-028, and REP2-029.	As set out within Section 18.15 of **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev03)]**, the cumulative land take of the Scheme alongside other solar developments would be up to 2.2% of all agricultural land in Lincolnshire. This represents a very small proportion of the total agricultural land in Lincolnshire, and is not considered to be significant.	Not Agreed	Low
1.32	Limited benefits of solar.	n/a	Limited benefits of solar (load factor & timing): that matching electricity supply with demand in the moment is an essential part of electricity supply, the Tillbridge Solar Project cannot deliver on claims to power approximately 300,000 homes owing to the low overall load factor for solar power in the UK, along with its intermittency and seasonal variation in output. See detailed comments in REP2-022, REP2- 026, REP2-028, and REP2-033.	While the Applicant recognises that solar power has a variable load factor due to its intermittent nature, advancements in energy storage and grid management technologies are effectively addressing these issues and as a result the Applicant can reasonably expect to be able to deliver power to 300,000 homes. The integration of Battery Energy Storage Systems (BESS) within the Scheme and the grid as well allows for the storage of excess solar energy, balancing supply with demand and enhancing reliability. Additionally, solar power contributes significantly to reducing carbon emissions, and combined with other renewable sources, it plays a crucial role in meeting energy needs and the Government's sustainability goals, as reflected in the Government's support of solar technology in policies NPS EN-1 (Ref. 2) and NPS EN -3 (Ref. 3).	Not Agreed	Low
1.33	Need for the Scheme	**Statement of Need [APP-210]**	Extensive ground-mounted solar is not necessary to deliver the UK Government's 70GW ambition for solar capacity: To reach the Government's target for solar capacity, extensive ground-mounted solar is not necessary; for instance, Germany has already installed 80GW of solar capacity, with 70% or more on rooftops,	The UK Government has identified through its energy policy, most recently in the NPS EN-1 (Ref. 2) and NPS EN-3 (Ref. 3), that there is a critical national priority for the provision of nationally significant low carbon infrastructure in the UK. As discussed in the Applicant's	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
			and without a single ground-mounted scheme even half the size of the Tillbridge Solar Project. Given the untapped resource of solar on domestic rooftops (only 3% of domestic properties have solar panels in the UK) and commercial properties (which, alone could double the UK's current solar capacity), there is no clear case for uncontrolled development of large scale, ground-mounted solar farms such as the Tillbridge Solar Project. See detailed comments in REP2-022, REP2-028, and REP2-033.	**Statement of Need [APP-210]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will be an important contribution to meeting this need. As discussed in the **Statement of Need [APP-210]**, the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace (given the greater complexity in securing sites and connections) and at an affordable cost to meet the Government's Net Zero targets and timeframes. Whilst rooftop solar is likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Scheme.		
1.34	Excess renewable energy generation.	ES **[APP-031 to APP-208]**	Questionable net effect of solar on CO_2 policy objective of allowing uncontrolled solar development: Uncontrolled development of large-scale solar farms such as the Tillbridge Solar Project has the potential to create significant periods of excess renewable generation, where, without sufficient long-term seasonal energy storage, there will be much greater levels of "curtailment" – where production is switched off as there more generation than demand. The incremental effect of "too much" solar will therefore diminish the potential power contribution the scheme may make and also the CO_2 policy objectives from each scheme. See detailed comments in REP2-022, REP2- 026, REP2-028, and REP2-033.	The Applicant does not consider that the Scheme is uncontrolled development. If the DCO is granted for the Scheme, it is legally bound by the Articles and Schedules set out within the development consent order. The DCO is a statutory instrument. This means that the Applicant will be bound by the provisions set out in the Order. This includes measures relating to the construction, operation, maintenance and decommissioning of the generating station ensuring that no new or materially different environmental effects arise from those assessed in the Environmental Statement forming part of the Application. The development consent will also secure environmental mitigation and commitment measures secured by requirements (conditions) that will be attached to the development consent. The requirements will secure detailed management plans to be substantially in accordance with the framework management plans that form part of the Application. These framework plans, along with the ES **[APP-031-**	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				208] that form part of the Application set out the likely significant effects of the Scheme on a range of environmental topics. This will be examined by the Examining Authority, and Secretary of State, who will balance the need and benefits of the Scheme against harm. If consented, the Scheme must be constructed, operated, maintained and decommissioned in full accordance with the requirements, articles and provisions in the DCO or it will be unlawful. The Scheme will therefore not be uncontrolled and will be an enforceable development stringently controlled through the provisions of the statutory instrument. As the UK moves towards net-zero 2050, it is important that the electrical grid is supported by both variable generation sources (e.g. solar/wind) and dispatchable generation sources (e.g. gas fired turbines with carbon capture). This, combined with increased energy storage systems and grid connectivity, will work to address current issues of curtailment as indicated by the NPS EN-1 (Ref. 2). In the Government report on decarbonising the electricity sector (Ref. 8), a total of 70 GW of solar energy capacity is targeted by 2035 (the UK is currently at 16 GW), a proportion of which is intended to be supplied by the Scheme. The BESS within the Scheme and also within the grid enables excess energy generation to be stored and supplied to the grid at non-peak solar production times.		
1.35	Solar has the least impact on electricity price.	n/a	Solar has the least impact on electricity price: solar provides power when demand is typically at its lowest in the UK, and along with the economics of supply and demand, this is when the prices are also typically at their lowest (at these times, already sometimes negative). The claimed economic benefit of solar on energy prices is, at best, therefore marginal. See detailed comments in REP2-022, REP2- 026, REP2-028, and REP2-033.	While solar power frequently generates electricity during periods of low demand and lower prices, its economic and environmental benefits are greatly enhanced when integrated with other technologies such as onshore and offshore wind, and crucially, both short-term and long-term energy storage. BESS plays a pivotal role in stabilizing supply and demand by storing excess solar energy produced during low-price periods and releasing it during peak demand, thus helping to alleviate price volatility. This storage capability not only maximizes the value of solar generation but also ensures a more reliable and resilient energy grid, reducing	Not Agreed	Low

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				reliance on fossil fuels and enhancing energy security, ultimately supporting market stability and driving down overall costs.		
1.36	Intermittent production of solar energy.	n/a	Claiming to be able to power homes with solar and batteries at low cost is misleading: The market value when the bulk of solar energy is produced in the UK, is already when prices are among their lowest, and sometimes even negative. That the developer will be paid a strike price which is likely to be significantly higher than these low or negative prices does not represent best value for the customer. This will be the case in particular where intermittent production – such as solar, outstrips the potential for long-duration energy storage (which BESS does not offer), leading to periods of excess renewable energy that is unusable and curtailment. See detailed comments in REP2-022, REP2-028, and REP2-033	While solar energy often generates during periods of low market prices, integrating solar with BESS and other technologies provides substantial benefits. Excess electricity is not necessarily a problem but represents potential that can be utilised through both short-term and long-term storage solutions, both within the Scheme and on the grid. Addressing these issues effectively requires a grid-level approach rather than solely focusing on individual projects, ensuring that the overall energy system can optimise and manage renewable energy contributions.	Not Agreed	Low
1.37	Lack of community benefit.	**Framework Skills, Supply Chain and Employment Plan [APP-232]** **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]**	Claims of community benefit are exaggerated: The proposed Tillbridge Solar Project takes power generated at low voltages in parcels of land that surround villages, stepping up the voltage through transformers to connect directly to the National Grid at 400kV, rather than directly to local villages, hence, the developer's claims to be able to "repower the region with clean, green energy" are misleading. No community benefits are secured in the dDCO and so any benefits claimed by the Applicant cannot be given any credit. See detailed comments in REP2-021, and REP2-032.	The Scheme will contribute to providing the region with renewable energy, as homes and businesses in Lincolnshire, Nottinghamshire and the wider East Midlands make use of the national electricity system that the Scheme will export to. It is the Applicant's intention to provide a community benefit package as part of the Scheme. The Applicant has engaged with both the Lincolnshire and Nottinghamshire community foundations and, should the Scheme receive development consent, the Applicant would provide a community benefit package. The Applicant has provided further information on the operation of the fund under the **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]** under Q2.1.3. Alongside this, the Applicant is committed to maximising the local economic benefits of the Scheme. The Applicant's proposals to help ensure this are set out in the **Framework Skills, Supply Chain and Employment Plan [APP-232]** (secured through Requirement 19 of the **draft DCO [EN010142/APP/3.1(Rev06)]**). The Scheme will also deliver other more localised economic, social and environmental	Not Agreed	Low

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				benefits. These include ecological enhancements, improvements to soil quality; improvements to the existing Public Rights of Way (PRoW) network through the provision of permissive paths (secured through Work No. 6 and 9 in Schedule 1 and Requirements 7 and 8 in Schedule 2 of the **draft DCO [EN010142/APP/3.1(Rev06)]**); and significant employment generation during construction.		
1.38	Poor use of strategic national infrastructure.	**Statement of Need [APP-210]**	Connecting solar directly to 400kV represents a poor use of strategic national infrastructure: using this connection to the National Grid for Tillbridge Solar Project would sterilise the use of a high voltage substation connection and preclude its use by future high-power applications, with greater flexibility to match demand or with a higher load-factor (such as Small Modular Reactors). See detailed comments in REP2-022, and REP2-028.	The Applicant considers that the 400kV Cable Route Corridor is the most efficient way of transferring power between the Principal Site and the existing National Grid Cottam Substation. Transferring the power at lower voltages would result in a requirement for additional cable circuits and a greater land take area which could have otherwise been avoided. For example, if the power was transferred using 132kV cables, three additional cable circuits would be required to operate effectively with the required amperage. Distributing the power at a lower voltage would significantly increase the amount of land take required and increase the environmental impact of the Scheme. As discussed in the **Statement of Need [APP-210]**, the Applicant recognises that energy alternatives such small modular reactors have an important role to play in decarbonisation. However, future high-power applications such as small modular reactors are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. As set out in the **Statement of Need [APP-210]**, due to technological advances, solar facilities are already among the cheapest form of electricity generation in the UK and Government forecasts indicate that costs will continue to reduce in the future. Larger solar schemes, such as the Scheme, deliver power more quickly and at a lower unit cost than other types of energy generation which have not yet been proven at scale, or are not yet being brought forward. The Government recognises in NPS EN-1(Ref. 2) that growth in solar capacity, alongside other renewable technologies, is expected to improve	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				the dependability of those assets as a combined portfolio, contributing to an adequate and dependable UK generation mix required to meet the UK's energy security needs, and the decarbonisation needs of the UK. Whilst future high-power applications such as small modular reactors are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Scheme.		
1.39	Connection to National Grid.	n/a	There is no requirement to connect solar direct to the National Grid: Because solar power is generated at low voltages, there are few restrictions to where it can be connected or located. That the developer has cited the connection to the National Grid at the Cottam substation as a starting point for the site location undermines the breadth of alternatives considered as part of the Tillbridge Solar Project development. See detailed comments in REP2-022, and REP2-028.	The Applicant has received a grid connection offer from National Grid as described in Ref. 1.40. The Scheme is capable of transferring over 500MW of renewable energy to the grid at any one time and therefore a connection directly to the National Grid Cottam Substation is deemed to be the most feasible option. Given the relatively low number of households in the surrounding area, the high-power generation anticipated from the Scheme and the varying electricity suppliers to households in the local area, it is not deemed feasible to transfer power directly from the Scheme to surrounding properties. The most effective way to harness the power generation is by direct connection to the grid.	Not Agreed	Low
1.40	Connection to National Grid.	**Statement of Need [APP-210]** **Grid Connection Statement [APP-214]**	The Tillbridge Solar Project provisions for an 18km cable corridor to connect to the National Grid. At a time where National Grid are under severe pressure to provide connection capacity to facilitate decarbonisation, in particular to support offshore wind – which will produce the c. 70% of future UK electricity – unlike solar which is likely to be c. 7%. The Tillbridge Solar Project therefore serves as an unnecessary distraction to National Grid in meeting its decarbonisation objectives, given that connection of solar at 400kV is unnecessary. See detailed comments in REP2-022, and REP2-028.	The Government has identified through its energy policy, most recently in the NPS EN-1 and NPS EN-3, that there is a critical national priority for the provision of nationally significant low carbon infrastructure in the UK. As discussed in the Applicant's **Statement of Need [APP-210]**, this includes low carbon energy generation using solar technology, alongside of other forms of low carbon energy generation, such as wind energy. The Scheme will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location	Not Agreed	Low

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				for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency. The **Grid Connection Statement [APP-214]** confirms that the Applicant has received a grid connection offer from National Grid Electricity System Operator Limited (NGESO) to connect the Scheme to the national electricity transmission network. The grid connection offer was provided by NGESO to the Applicant in January 2020. All subsequent modifications have related to the date which the Scheme would connect to the national electricity transmission network. NGET has confirmed that an existing spare bay within the National Grid Cottam Substation is currently available.		
1.41	Inefficient land use.	**Statement of Need [APP-210]** **Chapter 15: Soils and Agriculture** of the ES **[APP-046]** **Figure 15-1: Principal Site Agricultural Land Classification Distribution [APP-192]** **Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 2 [REP4-045]** **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]**	Given the low solar gain, the Tillbridge Solar Project constitutes a grossly inefficient use of land – let alone productive arable land and undermines the credibility of the developer to claim that reasonable alternatives have been considered. See detailed comments in REP2-022, REP2-028, REP2-029, and REP2-033.	NPS EN-3 (Ref. 3) provides specific design policies for solar development and recognises that there are a number of factors when considering the design and layout of large-scale ground mounted solar PV sites. Paragraph 2.10.17 outlines the requirements of solar farms, highlighting that a solar farm requires between 2 to 4 acres for each MW of output, with a typical 50MW solar farm consisting of around 100,000 to 150,000 panels covering between 125-200 acres. However, this may vary significantly. As set out in the **Statement of Need [APP-210]**, the site selection process for the Scheme included an assumption in favour of a contiguous site to allow the development of a cohesive design, and to derive a site that was sufficient to reflect the power output reflective of the Bilateral Connection Agreement with National Grid. This meant that the site selection process resulted in the Scheme being firmly within the range of expected site size for the expected MW output. As such the Scheme is within the estimated land use requirements for a solar farm set out within NPS EN-3 (Ref. 3), Paragraph 2.10.17. It is also noted that the Scheme is located primarily on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Principal Site, 95.5% of the land used is non	Not Agreed	Low

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				BMV land. This consists of 85.3% Grade 3b land (non-BMV) and 10.2% classified as non-agricultural. The remaining land, which comprises 4.5% (60.3 hectares) of BMV land, consists of 3.8% (51ha) of Grade 3a BMV land and 0.7% being classed as Grade 2, BMV land. The 4.5% of BMV land within the Principal Site comprises nine small, isolated parcels of BMV land. The parcels do not follow field boundaries and generally form isolated pockets across the Principal Site, as shown in **Figure 15-1: Principal Site Agricultural Land Classification Distribution** of the ES **[APP-192].** These parcels are in farming use alongside the lower grade BMV land. Further information on baseline agricultural land conditions is provided within **Chapter 15: Soils and Agriculture** of the ES **[APP-046]**. The Applicant has provided further information on the efficiency of land use within the **Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 2 [REP4-045]** (pages 24 to 27) and the **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]** under Q2.1.6.		
1.43	Flood Risk and Soil Erosion.	**Chapter 10: Water Environment** of the ES **[REP3-012]** **Appendix 10-4: Outline Drainage Strategy** of the ES **[APP-098]**	The potential for surface run-off and soil erosion from such a vast area of solar panels on this network does not appear to have been properly evaluated, particularly when considered in conjunction with other proposed schemes. The surface water runoff from all 4 schemes drains into the river Till, which already experiences frequent flooding resulting in the loss of thousands of acres of crops, interruption of farming practices due to saturated land and a significant reduction in farming productivity. The storm water runoff from Tillbridge Solar will seriously exacerbate an already existing problem on the flood plain of the River Till. Information available relating to flood management, drainage and soil erosion are therefore inadequate. See detailed comments in REP2-031.	The Scheme has assessed in detail the drainage and run off impacts of the conversion of the Principal Site from arable farmland to solar panels in **Chapter 10: Water Environment** of the ES **[REP3-012]**. Any impacts are managed via **Appendix 10-4: Outline Drainage Strategy** of the ES **[APP-098]**, which sets out the surface water drainage proposals for the Principal Site and has been prepared in accordance with national and local policies. The assessment concludes that the effect from operational site runoff on the water quality of surface water features and groundwater is not significant. This is on the basis of the measures included within **Appendix 10-4: Outline Drainage Strategy** of the ES **[APP-098]** to limit erosion and drainage run off. This includes the proposal to plant the area beneath and surrounding the solar panels with native	Not Agreed	Low

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				grasslands and wildflower mixes to slow water runoff and mitigate potential erosion. This planting will intercept and absorb rainfall running off the panels, preventing it from concentrating and potentially forming channels in the ground. To prevent ponding occurring around the panels, a series of boundary (and some routing) swales will be constructed to mimic natural drainage conditions. New access roads will be permeable, in accordance with paragraph 2.10.85 of NPS EN-3 (Ref. 3). By reverting the current arable land to grassland within the Principal Site, bare soil surfaces following cultivation are no longer left each year. The risk of soil erosion and surface runoff (with the attendant problems to water quality from sediment, nutrient, pesticide and faecal indicator organisms) is greatest where there is no planting cover to shield the soil from rainfall. The Scheme will therefore remove this existing source of soil erosion and runoff. It is also noted in respect of the comments on the impacts on the River Till, a portion of the Principal Site drains to the River Eau, via the Yewthorpe Beck to the north of the Principal Site, with only the southern and western extents draining indirectly to the River Till. For all proposed surface water discharge locations, the **Appendix 10-4: Outline Drainage Strategy** of the ES **[APP-098]** proposes to mimic the existing natural surface water runoff regime, limiting surface water runoff to greenfield rates, and providing attenuation, utilising swales around impermeable areas to capture additional runoff at source, where required, for the 1 in 100 year plus 40% climate change event.		
1.44	Long-term soil quality / BNG.	**Biodiversity Net Gain (BNG) Report [AS-062]** **Framework LEMP [EN010142/APP/7.17(Rev05)]**. **Draft DCO [EN010142/APP/3.1(Rev 06)]**.	The developer claims there will be a 10% biodiversity net gain from the Tillbridge Solar Project but have failed to explain how this would be achieved, nor is it clear what methodology or assumptions lie behind the assertion. See detailed comments in REP2-023.	A **Biodiversity Net Gain (BNG) Report [AS-062]** using DEFRA's Statutory Metric, has been produced for the Application. Based on the current design of the Scheme, as set out in the **Indicative Landscape Masterplan** (refer to **Appendix A** of the **Framework LEMP [EN010142/APP/7.17(Rev05)]**), the Scheme is predicted to result in a net gain of 64.44% for area-based habitat units, 17.28% for hedgerow units, and 22.94% for watercourse units. An	Not Agreed	Low

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		Framework Soil Management Plan (SMP) REP1-051]		updated BNG Report is required to be prepared and approved by the Local Planning Authority prior to construction, which will contain the final details and amount of BNG the Scheme will achieve, in line with the final detailed LEMP, which will be substantially in accordance with the **Framework LEMP [EN010142/APP/7.17(Rev05)]**. This is secured by Requirements 7 and 8 of the **draft DCO [EN010142/APP/3.1(Rev06)]**. The Applicant has committed to achieving a minimum level of BNG through the Scheme, as secured by both requirements 7 (landscape and ecological management plan) and 8 (biodiversity net gain) of Schedule 2 of the d**raft DCO [EN010142/APP/3.1(Rev 06)]**. Requirement 8 provides that construction cannot commence until a BNG strategy has been submitted and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body (being Natural England). The BNG strategy must be substantially in accordance with the **Framework LEMP [EN010142/APP/7.17(Rev 05)]**, which states at paragraph 4.6.2 that the Applicant is committed to achieving BNG, in accordance with the terms of the **Biodiversity Net Gain Report [AS-062]**. This approach is consistent with that adopted in the Gate Burton Energy Park Order 2024 [EN010131], which the Secretary of State (agreeing with the Examining Authority) confirmed is an appropriate mechanism for securing BNG (refer to paragraphs 4.13 and 7.4 of the Secretary of State's Decision Letter and paragraph 5.2.14 of the Examining Authority's Recommendation Report). In addition, a **Framework Soil Management Plan (SMP) [REP1-051]** has been submitted by the Applicant which sets out how the Applicant intends to preserve the soil resource during construction, operation and decommissioning, avoiding both the loss of soil material from the Scheme and the loss of soil functional capacity for supporting agricultural production. The Applicant will be required to submit a detailed		

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				SMP for approval by the relevant planning authority (/authorities) prior to construction, which must be in substantial accordance with the **Framework SMP [REP1-051]**. This is secured by Requirement 18 of the **draft DCO [EN010142/APP/3.1(Rev06)]**.		
1.45	Greenhouse Gas Assessment.	**Chapter 3: Scheme Description** of the ES **[REP4-016]** **Chapter 7: Climate Change** of the ES **[APP-038]**	The assumptions on solar panel life, failure rates, replacement regime and recycling rates are unclear, and therefore undermine confidence in the accuracy and validity of the GHG assessment. Evidence shows the economic life of solar panels is circa 20 years. The Applicant has made an over optimistic assessment of the GHG impact of their scheme. See detailed comments in REP2-033	The GHG impact assessment within **Chapter 7: Climate Change** of the ES **[APP-038]** details all assumptions used in the calculations of emissions. Solar panels are assumed to have a design life of 30 years, a 2% degradation per year and to be recycled at standard industry rates. In addition, **Table 3-1** in **Chapter 3: Scheme Description** of the ES **[REP4-016]** sets out the indicative design life of Scheme components which have been considered within the assessment.	Not Agreed	Low
1.46	Role of Batteries.	**Outline Design Principles Statement [REP4-020]**. **Chapter 3: Scheme Description** of the ES **[REP4-016]**. **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046]**	The developer provides very little detail on the storage facility included in the proposed development. Operating in a separate segment of the electricity market, it is unclear therefore whether the proposed energy storage system can truly be considered to be associated development for the proposed solar farm. See detailed comments in REP2-026, and REP2-033.	The Battery Energy Storage System (BESS) is associated development that is subordinate to the principal development (solar PV). It is designed to complement and enhance the efficiency and reliability of the solar farm. The DC coupling of the solar farm and storage system highlights their interdependence, ensuring that both systems operate seamlessly together and optimise overall project performance. A description of the BESS proposals is provided within **Chapter 3: Scheme Description** of the ES **[REP4-016]**. Furthermore, the design principles for the BESS are set out within the **Outline Design Principles Statement [REP4-020]**. The Applicant also provided further information within Appendix B of the **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046].**	Not Agreed	Low
1.47	Safety & Environmental risks of batteries.	**Outline Design Principles Statement [REP4-020]** **Framework Battery Safety Management Plan (BSMP) [REP4-026]** **Appendix 17-5: Unplanned Atmospheric Emissions from BESS** of the ES **[APP-123]**.	The safety and environmental concerns arising from battery development at this scale have not been appropriately considered, including through operation and transportation. Large scale battery installations have begun to be developed in recent years but have been susceptible to failures involving fires and the emission of toxic and flammable fumes. Resulting in environmental damage from toxic run-off.	A **Framework Battery Safety Management Plan (BSMP) [REP4-026]** has been prepared with input from the Lincolnshire Fire and Rescue Services alongside the Application which provides mitigation and management measures for thermal runaway safety risks posed by the BESS in the Scheme. At the time of installation, the Applicant will work closely with the Fire and Rescue Service to	Not Agreed	Low

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		Chapter 17: Other Environmental Topics of the ES **[APP-048].** **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 3 {REP4-049]**	The Applicant has provided minimal detail on the BESS construction and layout and so it is not possible to assess if the BESS is suitable and safe for a rural environment. In particular there is no information on how fire water, as required by the National Fire Chiefs' Guidance, will be provided to each BESS location. See detailed comments in REP2-026.	provide all relevant information on BESS and site design features to inform all necessary hazard and risk analysis studies and assist in the development of comprehensive Risk Management (RM) and Emergency Response Plans (ERP). This will include embedded design features to manage emergency scenarios such as fires should they arise, including dedicated fire water storage tanks and/or hydrants. The design principles for the BESS set out within the **Outline Design Principles Statement [REP4-020]** have been based on several factors including baseline environmental conditions and other potential sources of fire hazard in the surrounding area. The distance of BESS to residential areas and commercial properties has also been carefully considered to minimise operational or incident impacts on receptors and there will be no BESS within 250m of residential properties. The Applicant has provided an assessment of the effects of an unplanned fire relating to the proposed BESS. This can be found in **Appendix 17-5: Unplanned Atmospheric Emissions from BESS** of the ES **[APP-123]**. The assessment demonstrates that in the unlikely event of a fire, after 200m the atmospheric emissions of hydrogen fluoride from the BESS would be below acute exposure guideline levels and therefore, would not result in a significant effect on human health. The Applicant also provided further information on fire safety as part of the **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 3 {REP4-049]**, pages 8-12.		
1.48	Glint and Glare.	**Chapter 17: Other Environmental Topics** of the ES **[APP-048]** **Appendix 17-2: Glint and Glare Assessment** of the ES **[APP-120]** **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 3 {REP4-049]**	The impact of glint and glare on aviation (e.g. RAF, airfields, gliding clubs), or other outdoor activities (e.g. horse riding, hunts) has not been thoroughly considered, as well as the risk of reflected glare from the panels affecting prominent roads. The Applicant is required to demonstrate that the impact of glint and glare is minimal.	**Chapter 17: Other Environmental Topics** of the ES **[APP-048]** and supporting **Appendix 17-2: Glint and Glare Assessment** of the ES **[APP-120]** provides an assessment of glint and glare effects of the Scheme. In accordance with NPS EN-3 (Ref. 3), the assessment considers effects upon surrounding road users, railway operations, dwellings, PRoW, bridleways and aviation activity, based on the visibility of PV panels from receptors, their angles using	Not Agreed	Low

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			The Applicant has only considered receptors within 1km from the scheme, despite many receptors having an elevated view of the scheme only metres beyond the arbitrary 1km boundary. The US Federal Aviation Authority's (FAA) quantitative assessment methodology selected by the Applicant has been misapplied. This results in an underestimation of the actual impact of glare. The Applicant has not taken account of actual observer heights, such as the upstairs window of a residence, so underestimating the impact of glare. The Applicant has not taken account of the cumulative effect of glare, in accordance with Advice Notice Seventeen. The Applicant has not taken account of receptors with common eyesight conditions. The Applicant takes no account of the impact on livestock and equestrian activities, which are a feature of this area. **7000 Acres submitted a WR on glint and glare but it is missing from the Examination Library.**	geometric calculations, and amount of sunlight. The assessment notes that the Scheme's design, which includes careful siting in the landscape, conserving existing vegetation patterns and creating new green infrastructure through planting, will mean that it is unlikely that adverse effects will be experienced from glint and glare. The glint and glare assessment concludes that there will be no impacts on bridleways, residential receptors or road receptors, and low (not significant) impacts on aviation receptors on Runway 27 at Sturgate Airfield. The Applicant also provided a further response on the impact of glint and glare on aviation receptors in **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 3 {REP4-049],** page 12.		
1.49	Noise impacts.	**Framework CEMP [EN010142/APP/7.8(Rev03)]** **Framework DEMP [EN010142/APP/7.10(Rev03)]** **Framework CTMP [EN010142/APP/7.11(Rev05)]** **Framework OEMP [REP4-022]**. **Outline Design Principles Statement [REP4-020]** **Chapter 13: Noise and Vibration** of the ES **[AS-006]**	It is unclear from the information provided by the developer what noise pollution will arise from the proposed Tillbridge Solar Project, either from electrical equipment (e.g. battery and inverter fans), which can be particularly noisy, or from wind noise / resonance from the configuration of large panel structures. Please see detailed comments in REP2-032.	**Chapter 13: Noise and Vibration** of the ES **[AS-006]** provides an assessment of noise and vibration effects on local receptors and identifies measures which have been incorporated within the Application to minimise these effects. During construction and decommissioning, the primary sources of noise will be plant and works traffic. A detailed list of these sources of noise is provided in **Appendix 13-4** of the ES **[AS-008]**.The **Framework CEMP [EN010142/APP/7.8(Rev03)]** and **Framework DEMP [EN010142/APP/7.10(Rev03)]** incorporate best practicable means set out in BS 5228-1 (Ref. 9) and BS 5228-2 (Ref. 10) to control noise and vibration respectively during the construction and decommissioning phases. In addition, construction traffic on the highway network will	Not Agreed	Low

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		Appendix 13-4 of the ES **[AS-008]**		be managed through the **Framework CTMP [EN010142/APP/7.11(Rev05)]**. Where necessary, the Applicant will submit an application for prior consent to carry out noisy work under Section 61 of the Control of Pollution Act 1974 (Ref. 11) to demonstrate that noise and vibration has been minimised as far as reasonably practicable. With these measures in place, no significant effects from the construction and decommissioning phases are considered likely. During operation, the primary sources of noise are expected to come from the BESS, inverter fans, shunt reactors and transformers. No noticeable increase in wind noise is anticipated from the operation of the plant. Noise from permanent plant will be controlled through the measures set out within the **Framework OEMP [REP4-022]**. In addition, the Scheme layout has been optimised to locate inverters as far as practically possible from sensitive receptors where the highest levels of noise were predicted. The **Outline Design Principles Statement [REP4-020]** sets out the commitment to locate Solar and BESS Stations at least 250m from residential properties. With these measures in place, the modelling of the noise from the above plant has indicated that there would be no significant noise effects from the operational phase.		
1.50	Decommissioning Arrangements.	**Framework DEMP [EN010142/APP/7.10(Rev03)]** **Framework OEMP [REP4-022]** **Draft DCO [EN010142/APP/3.1(Rev06)]** **Chapter 3: Scheme Description** of the ES **[REP4-016]** **Chapter 17 Other Environmental Topics** of the ES **[APP-048]**	Through-life Maintenance Replacement of Panels & Recycling: The Tillbridge Solar Project documentation provides little detail on the assumptions for the operational lifetime of solar panels or the arrangements for replacing and recycling millions of panels, perhaps twice through the lifetime of the project. Similarly, there are few details on arrangements for decommissioning and recycling, nor the standards to which the developer would be held to at the end of the life of the project. Given that the developer does not have experience of development at this scale, there is no guarantee the region is not left with the legacy of a disused industrial solar installation liability occupying a huge area at the end of the project's lifetime. See detailed comments in REP2-033.	A description of the operational phase and decommissioning phase activities, including the indicative design life of the Scheme components, is provided in **Chapter 3: Scheme Description** of the ES **[REP4-016]**. Operational and decommissioning waste effects are assessed in **Chapter 17 Other Environmental Topics [APP-048]**. The removal of solar infrastructure at the end of the Scheme's operational life is secured. The **Framework DEMP [EN010142/APP/7.10(Rev03)]** requires the removal of all solar PV array infrastructure including modules, mounting structures, cabling inverters and transformers and concrete foundations. The detailed DEMP must be	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
				substantially in accordance with the Framework DEMP, per Requirement 20 of the **draft DCO [EN010142/APP/3.1(Rev06)]**, and non-compliance with a DCO requirement would be a criminal offence. As set out in the **Framework OEMP [REP4-022]** for replacements during the operational phase and **Framework DEMP [EN010142/APP/7.10(Rev03)]** during the decommissioning phase, the Applicant is committed to maximise recycling and reuse of the Scheme components at the end of their life. There are already organisations around the UK and Europe specialising in solar recycling, such as PV Cycle and the European Recycling Platform. They are working with solar developers to minimise electrical waste and recycling old panels in line with the Waste Electrical and Electronic Equipment (WEEE) Regulations (Ref. 12). In addition, companies like SECONDSOL offer a marketplace service for the purchase and selling of second-hand PV panels and equipment, where there is still a good level of life in the equipment remaining. Panels that have developed faults or damage can also be refurbished and repowered by specialist companies and manufacturers and resold or reinstalled. The Applicant will adhere with the industry best practice outlined in Solar Power Europe's Lifecycle Quality Best Practice Guidance (Ref. 13). The **Framework OEMP [REP4-022]** and **Framework DEMP [EN010142/APP/7.10(Rev03)]** confirm that the Applicant will implement the waste hierarchy and commit to diverting a minimum of 70% of the waste from landfill.		
1.51	Financial Due Diligence.	**Framework DEMP [EN010142/APP/7.10(Rev03)]** **Draft DCO [EN010142/APP/3.1(Rev06)]** **Funding Statement [APP-018]**	It is evident from Financial Returns that neither Tillbridge Solar Project Limited does not have direct capital to support the estimated £500+ Million pounds to develop the project or deal with the decommissioning of the Tillbridge Solar Project. It is widely expected therefore that if approved the Project will be sold or further investment found. It will be important that the decommissioning is secured and be completed with the land being returned to its previous state. With this in mind it is strongly	Tillbridge Solar Limited is a joint venture between two established companies: Recurrent Energy (a Canadian Solar company) and Tribus Clean Energy. The Applicant has the means to acquire the required rights and build the Scheme as set out in Section 2.3 of the **Funding Statement [APP-018]**.	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
			recommended that if the application is approved, it is made explicit within the DCO that this should be conditional on the incumbent landowners ultimately being made responsible for the identified decommissioning as a backstop against unforeseen circumstances, e.g. financial default by the developer or its successor companies. Similarly, the ethical and sustainable stewardship of the asset should be safeguarded – unlike the recent example of Thames Water, where one of their lead shareholders is now involved in green finance of solar schemes.	The Applicant is committed to ensuring that the Scheme is decommissioned at the end of its operating life. Decommissioning of the Scheme is a requirement included in the **draft DCO [EN010142/APP/3.1(Rev06)]**. This requires that the decommissioning be carried out in accordance with a Decommissioning Environmental Management Plan. A framework version of this document has been submitted with the Application – the **Framework DEMP [EN010142/APP/7.10(Rev03)]**. This requirement will be enforceable against anyone who holds the benefit of the Order at the time that the Scheme is decommissioned and failure to comply with the requirement would be a criminal offence.		
1.52	Sustainability and ethics in sourcing of materials.	**Framework Skills, Supply Chain and Employment Plan [APP-232]** **Draft DCO [EN010142/APP/3.1(Rev06)]**.	The U.S. government has identified forced labour in China as an area of concern for the solar supply chain. Furthermore, the process of extracting the raw materials for batteries requires large amounts of energy and water, often in mines where workers face unsafe conditions. Any materials sourced by the developer for the Tillbridge Solar Project should be truly sustainable, e.g. free of forced labour, where workers' safety is paramount, and where the full environmental implications are understood. Canadian Solar is a major backer of this Scheme. The Company has been identified in human rights research, and by the House of Commons, to having a supply chain linked to human rights abuses in China. https://committees.parliament.uk/oralevidence/14238/html/ See detailed comments in REP2-033.	At this stage the final choice of panels is not known and a supplier has not been identified. However, the Applicant recognises that there are risks of modern slavery being connected to UK businesses and supply chains and will comply with all legal obligations regarding modern slavery. Regarding this, the **Framework Skills, Supply Chain and Employment Plan** (SSCEP) **[APP-232]** sets out that the procurement strategy for the Scheme must be shaped to maximise opportunities to local businesses, with an ethical procurement policy, whilst seeking to minimise associated environmental impacts and safeguarding human rights in the supply chain. The final SSCEP must be substantially in accordance with the Framework SSCEP, and is required to be submitted to and approved by the relevant planning authority (/authorities) before construction can commence on the Scheme. This is secured in Requirement 19 of the **draft DCO [EN010142/APP/3.1(Rev06)]**.	Not Agreed	Low
1.53	Community Liaison Group	**Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-046]** **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]**	The Group requests further information on how the community can raise concerns during the implementation of the DCO Application. Terms of reference for the Community Liaison Group should be secured in the DCO	The Applicant has set out example terms of reference for the Community Liaison Group (CLG) within **Appendix E** of the **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046]** submitted at Deadline 1**.**	Not Agreed	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
		draft DCO [EN010142/APP/3.1(Rev06)]	Furthermore, the terms of reference for the Community Liaison Group (CLG) at present do not include the community. This is not credible. Residents are the ones with the immediate knowledge and experience of the impacts on their lives and the local environment and as such will be able to provide vital guidance and information for the CLG. The terms of reference for the CLG need to include the community at this level. To exclude the community representatives is contradictory in terms of the CLG's purpose and reason for being.	The Applicant has also provided further information on the operation of the CLG within its **Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-046]** at page 18 and within **Applicant's Response to the Examining Authority's Second Written Questions [EN010142/APP/9.35]** under Q2.1.12. In summary, the initial terms of reference for the CLG will need to be approved by the relevant planning authorities prior to the start of construction, in accordance with Requirement 4 of the **draft DCO [EN010142/APP/3.1(Rev06)]**. Local planning authorities are the democratically elected representatives of local communities and have allocated resource and experience in planning matters. Tying approval for Requirement 4 to the local planning authorities ensures that the drafting of the requirement is precise and enforceable. In addition, the relevant planning authorities can ensure that the terms of the CLG are complementary with the terms of the CLGs for the other solar schemes in Lincolnshire. The CLG would include people living locally and representatives of local interest groups. Following the initial meeting of the CLG, the group will then be able to steer how its purpose is achieved and what actions are undertaken. This means that the group can take into account new inputs and preferences directly from community members and allow the CLG and its terms to develop alongside the Scheme (within the overarching framework of the agreed terms of reference).		

Table 4-2: Specific actions that 7000 Acres Group and the Applicant agreed to progress matters under discussion

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
1.1.a)	Impacts of the Scheme outweigh its benefits	**Appendix B of Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-046]**	The Group requests further information on the Scheme's generating capacity, proposed overplanting and the BESS capacity and design.	The Applicant has set out further information on these matters in **Appendix B** of **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 [REP1-046]** submitted at Deadline 1.	Under discussion	Low
1.2.a)	Impact on Health and Wellbeing	**Framework CTMP [EN010142/APP/7.11(Rev05)]** **Framework PRoW Management Plan [REP3-041]** **Framework CEMP [EN010142/APP/7.8(Rev03)]** **Framework OEMP [REP4-022]** **Framework DEMP [EN010142/APP/7.10(Rev03)]** **Framework LEMP [EN010142/APP/7.17(Rev05)]** **Framework Battery Safety Management Plan [REP4-026]**	The Group requests for further information how impacts on health would be controlled/ monitored and what happens if monitoring shows that mitigation is not effective. The issues raised in REP2-032 should be addressed in detail by an independent medical expert engaged by the Applicant.	Control and monitoring measures proposed which are of relevance to health determinants are set out within the following documents: • **Framework CTMP [EN010142/APP/7.11(Rev05)]**; • **Framework PRoW Management Plan [REP3-041]**; • **Framework CEMP [EN010142/APP/7.8(Rev03)]**; • **Framework OEMP [REP4-022]**; • **Framework DEMP [EN010142/APP/7.10(Rev03)]**; • **Framework LEMP [EN010142/APP/7.17(Rev05)]**; • **Framework Battery Safety Management Plan [REP4-026]**. Each of these documents set out requirements for monitoring, checking and corrective action to be undertaken, if required. Furthermore, the Applicant proposes to utilise the Community Liaison Group to minimise impacts that may arise from potential stress associated with communications around the delivery of the Scheme.	Under discussion	Low
1.3.a)	Visual impacts	n/a	The Group will consider what further information is required to understand the LVIA effects.	The Applicant waits for further clarification from the 7000 Acres Group.	Under discussion	Low
1.3.b)	Visual impacts	**Chapter 12: Landscape and Visual Amenity [REP4-013]** **Appendix 12-5: LVIA Assessment of Landscape Effects [APP-105]** **Appendix 12-6: LVIA assessment of Visual Effects [REP3-008]** **Figure 12-12: Representative LVIA Viewpoints [APP-184]** **Figure 12-14A-J: Visualisations (Photomontages) [APP-187]**.	The Group requests further information on Year 1 operational effects.	The Applicant's assessment of Year 1 operational effects is set out within the following documents: • **Chapter 12: Landscape and Visual Amenity [REP4-013]**; • **Appendix 12-5: LVIA Assessment of Landscape Effects [APP-105]**; • **Appendix 12-6: LVIA assessment of Visual Effects [REP3-008]**; • **Figure 12-12: Representative LVIA Viewpoints [APP-184]**; • **Figure 12-14A-J: Visualisations (Photomontages) [APP-187]**.	Under discussion	Low

Ref.	Topic	Relevant Application Document	7000 Acres' Position	Applicant's Position	Status	Likelihood of Resolution
1.3.c)	Visual impacts	**Framework LEMP [EN010142/APP/7.17(Rev05)]**	The Group requests further information on monitoring the effectiveness and maintenance of mitigation planting.	The requirements for management, maintenance and monitoring of landscaping are set out within Section 8 of the **Framework LEMP [EN010142/APP/7.17(Rev05)]**. In accordance with paragraph 9.3.1b) of the **Framework LEMP [EN010142/APP/7.17(Rev05)]**, the appointed Landscape Clerk of Works will be responsible for monitoring and assessing the landscape related elements of the approved LEMP for their effectiveness on a quarterly basis for the five years following commencement of operation of the Scheme (the establishment period), and then subsequently (as the final LEMP) for the duration of the Scheme at a minimum of 2 visits per year until year 10 and then a minimum of 1 visits per year until the end of the operational life of the Scheme. Further monitoring will be provided by the Ecological Clerk of Works in respect of ecological mitigation measures. Any changes to these frequencies and timescales, along with standards of monitoring and maintenance, will need to be approved by the Local Planning Authority prior to the preparation of the detailed LEMP. Monitoring will inform any required changes to management prescriptions and further remedial actions that may be required within the LEMP. This will include the selection of appropriate species that are observed to establish more rapidly than any that do not show predicted growths, as part of the replacement of failed plants.	Under discussion	Low

5. References

Ref. 1 His Majesty's Stationery Office (HMSO) (2008) Planning Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents [Accessed 09/09/2024]

Ref. 2 Department for Energy, Security and Net Zero (2023) National Policy Statement for Energy (EN-1). Available at: https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1 [Accessed 11/10/2024]

Ref. 3 Department for Energy, Security and Net Zero (2023) National Policy Statement for Renewable Energy (EN-3). Available at: https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3 [Accessed 11/10/2024]

Ref. 4 HMSO (2017). Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations'). Available at: https://www.legislation.gov.uk/uksi/2017/572/contents [Accessed 11/10/2024]

Ref. 5 House of Commons Environmental Audit Committee Report (29th November 2023). The financial sector and the UK's net zero transition. Available at: https://committees.parliament.uk/work/6734/the-financial-sector-and-the-uks-net-zero-transition/publications/ [Accessed 11/10/2024]

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Ref. 7 Natural England (2012) Technical Information Note TIN049 - Agricultural Land Classification: Protecting the best and most versatile land. Available at: https://publications.naturalengland.org.uk/publication/35012 [Accessed 11/10/2024]

Ref. 8 Business, Energy and Industrial Strategy Committee (2023). Government report on decarbonising the electricity sector. Available at: https://committees.parliament.uk/work/6717/decarbonisation-of-the-power-sector/publications/. [Accessed 11/10/2024]

Ref. 9 British Standards Institute (2009). Code of Practice for Noise and Vibration Control on Construction and Open Sites -Noise.

Ref. 10 British Standards Institute (2009). Code of Practice for Noise and Vibration Control on Construction and Open Sites – Vibration.

Ref. 11 HMSO (1974). Control of Pollution Act 1974. Available at: https://www.legislation.gov.uk/ukpga/1974/40 [Accessed 11/10/24]

Ref. 12 Office for Product Safety and Standards and Department for Environmental, Food and Rural Affairs (Defra) (2013) The Waste Electrical and Electronic Equipment Regulations 2013. Available at:

https://www.legislation.gov.uk/uksi/2013/3113/contents/made [Accessed 11/10/2024]

Ref. 13 Solar Power Europe (2021). Solar Power Europe's Lifecycle Quality Best Practice Guidance. Available at: https://www.solarpowereurope.org/insights/thematic-reports/lifecycle-quality-best-practice-guidelines-version-1-0 [Accessed 11/10/2024]

Ref. 14 NESO (2025) Transmission Energy Capacity Register. Available at https://www.neso.energy/data-portal/transmission-entry-capacity-tec-register [Accessed 14/02/2025]