Tillbridge Solar

Tillbridge Solar Project

EN010142

Applicant's Comments on Interested Parties' Submissions to Second Written Questions at Deadline 5

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1. Introduction

1.1 Purpose of this document

1.1.1 The purpose of this document is to provide additional comments on submissions by Interested Parties' to the Examining Authority's (ExA's) second written questions submitted at Deadline 5 that include matters that have not been considered previously.

1.1.2 The Applicant's responses to the ExA's second written questions were provided at Deadline 5 **[REP5-039]**. Those responses remain the Applicant's position, and where the Applicant has not commented further on the responses of Interested Parties to the second written questions, that should not be taken as being acceptance of the Interested Parties' position by the Applicant – the Applicant has sought to focus its responses in order to avoid unnecessarily creating additional written responses that only reiterate its position, as already set out. Therefore, where the submissions by Interested Parties to the ExA's second written questions (1) do not raise new matters, or (2) raise matters which the Applicant considers it has already appropriately responded to in its original response to the ExA's second written questions (**[REP5-039]**), no further response to those submissions has been included in **Table 2-1** below. **Table 2-1** only includes matters the Applicant has new or further comments on which arise from the submissions of Interested Parties.

1.1.3 The Interested Parties' submissions to the ExA's second written questions at Deadline 5 which include matters that the Applicant would like to comment on are set out in **Table 2-1** below.

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2. Applicant's comments on Interested Parties' Submissions to Second Written Questions at Deadline 5

Table 2-1. Applicant's response to Interested Parties' submissions

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
Q2.1.1	WLDC	Central Lincolnshire Local Plan (2023) Policies Could West Lindsey District Council (WLDC) please respond to the applicant's response to Q1.1.4 [REP3- 062], which relates to the relevance of various development plan and other policies?	With regard to Policy S17, WLDC disagrees with the response provided by the Applicant. The policy relates to the protection of 'Carbon Sinks', which does not solely relate to 'peat soils' as stated by the applicant. It also encompasses the protection of features such as woodland, trees, scrub, open habitats and farmland, rivers, and wetland habitats.	With regard to Policy S17: Carbon Sinks of the adopted Central Lincolnshire Local Plan, the supporting text associated with the policy clearly explains that the primary purpose of the policy is to protect, preserve and enhance peat and peaty soil to ensure that they continue to store carbon. The Applicant acknowledges that the policy also relates to *"other identified carbon sinks",* which can include woodland, trees and farmland and that "*the applicant must submit a proportionate evaluation of the impact of the proposal on the identified carbon sink as relevant and in all cases an appropriate management plan must be submitted".* The Principal Site is currently in use as intensive arable farmland. This will be relatively poor in function as a carbon sink. The Scheme will result in a temporary change in land use from intensive farming to solar PV with grassland planted underneath panels, the retention of existing trees and woodland and the enhancement of existing habitats. The Scheme will provide a temporary net positive impact due to the higher carbon sequestration value of grassland compared to arable land. **Chapter 7: Climate Change** of the ES **[APP-038]** (paragraph 7.3.21) sets out a proportionate evaluation of the impact in accordance with Policy S17 of the adopted Central Lincolnshire Local Plan (Ref. 1). The construction, operation and decommissioning of the Scheme will be managed in accordance with detailed management plans, to be substantially in accordance with the framework management plans forming part of the Application and secured via relevant Requirements in the DCO. These control measures would include the management of soils and habitats thereby also ensuring compliance with Policy S17: Carbon Sinks of the adopted Central Lincolnshire Local Plan (Ref. 1).
Q2.1.21	7000 Acres	Overplanting In its post-hearing submissions [REP4-062] 7000 Acres state in part: 'For an overplanted scheme, additional panels are installed, and the applicant seeks to use the full grid capacity for a greater	There are two potential direct uses for BESS that are directly related to curtailment of the solar scheme. Firstly, by over-planting, the developer has "designed in" a constraint, whereby solar output will exceed the grid capacity. On a sunny clear day in summer, the BESS is likely to prevent a degree of clipping (curtailment), depending on its usable capacity. After	The Applicant provided a response to the basis of 7000 Acres' comment within **Table 2-1**, page 31 to 34 of the **Applicant's Response Written Submissions at Deadline 4** [REP5-033]. Previous responses comprehensively explain the role of BESS in supporting the Scheme and managing curtailment. 7000 Acres' assertion that the BESS "*may well be often full*" is speculative and not based on any operational assessment of the Scheme. The BESS has been designed with existing and anticipated constraints in mind, ensuring that curtailments can

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		proportion of the time (as opposed to overcome performance degradation over time). The unfortunate consequence of this is that the electricity that would exceed the grid connection capacity is "clipped" or curtailed and effectively lost. This means that, while the volume of energy produced over a day is increased, because of the increased installation of panels, the yield of the installed capacity falls, and the effective output per-panel is reduced.' However, could 7000 Acres please comment on whether the proposed BESS would reduce the clipped energy?	that, the BESS is charged, and clipping/curtailment will commence. Secondly, with current peak UK electricity demand of c. 35,000MW in the summer, and the potential for 70,000MW of solar power, there is likely to be significant periods of excess power (and this excludes other generation such as wind or nuclear). This will require energy storage or otherwise such excess will be curtailed / wasted. On a summer day, particularly with widespread sunshine across the country, the National Grid will inevitably be required to instruct solar generators to be curtailed – or they may use their BESS to store energy even without the 500MW export capacity being reached. The BESS may well be often full before it can be used for any "designed-in" curtailment. Notably, where the Applicant is directed to reduce output by National Grid, they will typically still be paid the CfD rate for the unusable power they generate, with the cost ultimately borne by the consumer. There is no incentive therefore for the developer to consider the degree of curtailment that the scheme may face owing to excess generation – yet this will reduce the output of the scheme (MWhrs) and therefore the benefit it can offer. Also, while the Applicant stated the total capacity, BESS are rarely completely discharged for reliability reasons. Depending on the depth of discharge, the available storage capacity will be less than the claimed capacity. 7000 Acres reiterates its case that the primary economic purpose of the BESS is energy arbitrage, particularly during periods of high wind.	be effectively mitigated through strategic charge and discharge cycles. Asset operators forecast surplus generation in advance allowing the BESS to be managed accordingly, meaning it would not be fully charged at the start of a high-irradiation day when additional capacity is likely to be required for output balancing. Furthermore, as previously explained, the BESS primarily supports the solar generation by capturing excess energy and discharging it when required. This function ensures that the Scheme's overall output remains maximised and does not result in reduced energy delivery to the grid. Assertions regarding energy arbitrage being the primary economic purpose of the BESS overlook the fundamental function of enhancing solar integration, reducing curtailment, and improving grid stability, all of which contribute directly to the objectives of the Scheme.
Q2.2.1 and Q2.2.2	Carol Gilbert	**Ground Nesting Birds** What is the potential for change to ground nesting bird populations arising from the construction phase and operational phase of the development? How will these populations change over time and also how will species dependant on these populations such as birds of prey change as a result? Species Increase	I have great concern that ecological impacts are not being addressed in any meaningful way. There are conflicts within the baseline reports as detailed below: "Barn Owl" EN010142-000271-6.2%20Appndx%209-8%20Baseline%20Report%20for%20NonBreeding%20Birds.pdf There has been a concentrated effort to enable Barn Owls to increase their population with the installation of Barn Owl breeding boxes along the length of the [redacted], Lincolnshire. These have been successful and Barn Owls have been noted breeding in the locations where boxes have been installed. Adult Owls	The inclusion of Barn Owl *Tyto alba* in **Appendix 9-8: Baseline Report for Non-Breeding Birds** of the ES **[APP-089]** only refers to their presence outside of the breeding season. Barn Owl were also recorded during the breeding season as detailed in **Appendix 9-7: Baseline Report for Breeding Birds** of the ES **[APP-087]**. The breeding population of Barn Owl are also identified as an Important Ecological Feature (IEF) in **Table 9-11** within **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]**, with potential impacts on the species considered in **Table 9-15**. This concludes that as there will be no loss of nesting habitats used by the species, there will be no significant adverse effects on Barn Owl.

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		Post construction and during the operational phase the enclosed and protected nature of the site might give rise to population growth of a variety of species as has been noted at other significant sites of change from agriculture to a managed biodiversity site. What are the risks presented to the community by this potential growth and how does the Applicant propose to manage it to avoid it becoming a nuisance such as pests, or risk, such as collision with traffic?	have been observed hunting to feed their young in the immediate vicinity of [redacted]. The inclusion of Barn Owl in the non-breeding birds report is incorrect. There is, again, no mention of Swans in any documentation regarding watercourses. They should be classed as one of the ground nesting birds which will be subject to harm. This should be addressed. There are many red listed species in the proposed area which Tillbridge Solar wish to develop. There seems to be little mitigation proposed, save that the birds will probably return once construction is finished. This is a simplistic approach and our red listed species deserve a better response. The species at risk for this location can be found on the DEFRA 'Magic Map'. "9.4.36 In assigning values to species populations, it is important to take into account the status of the species in terms of any legal protection. However, it is also important to consider other factors such as its distribution, rarity, population trends and the size of the population which would be affected." EN010142-000401-6.1%20Chapter%209%20Ecology%20and%20Nature%20Conservation.pdf There is no mention of the large population which is commonly observed throughout the 4 solar park sites (Tillbridge, Cottam, West Burton and Gate Burton). Since [redacted] are not taken into consideration within the ecological report there is a distinct lack of knowledge not only of the size and distribution of population but the direct impact that restrictions placed upon the [redacted] will have to the surrounding areas. Fencing off large tracts of land (especially in combination with the other 3 solar sites) will have a consequence of increasing density in nearby areas. This will inevitably lead to more conflict simply by funnelling the [redacted] towards highways. The result will lead to more fatalities of [redacted] (and persons travelling within vehicles). There does not appear to be any mitigation proposed. "9.4.47 A significant effect is an effect that is sufficiently important to require assessment and reporting so that the decision maker is adequately informed of the environmental consequences of permitting a project. In broad terms, significant effects encompass impacts on structure and function of defined sites, habitats or	Although no swans, of any species, were recorded during either breeding or non-breeding bird surveys, the Applicant accepts that Mute Swan *Cygnus olor* are likely to be present on watercourses in the wider landscape. This was also noted in the desk study records presented in **Appendix B** of **Appendix 9-8: Baseline Report for Non-Breeding Birds** of the ES **[APP-089]**. However, Mute Swan is a common and widespread species of low conservation importance, so does not meet the criteria set out in Section 3.5 of **Appendix 9-8: Baseline Report for Non-Breeding Birds** of the ES **[APP-089]** or section 9.4 of **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]**, for consideration as an IEF and is therefore, not specifically assessed in **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]**. However, irrespective of this, there will be minimal disturbance to watercourses within the Order limits, with the River Till subject to non-intrusive methods for cable installation. In addition, the cessation of agricultural practices will remove nutrient inputs into watercourses, benefiting water quality and associated aquatic vegetation which support their habitat. All watercourses will also be offset from development by a 10m buffer, protecting and maintaining riparian habitats and corridors. Further to this, no significant aggregations of waterbirds were identified, due to the Order limits consisting predominantly of arable farmland and absence of suitable wetland habitats. The Order limits do not sit on a specific migratory flyway (although migratory birds will pass over on a broad front, as they do across most of the UK), nor are there any important wetland sites nearby which attract large aggregations of waterbirds. Given that migratory waterbirds can travel thousands of kilometres between breeding and wintering sites, negotiating significant man-made infrastructure and modified landscapes along their routes, as well as there being an absence of data to suggest that birds will mistake solar panels as being a body of water, no impacts to waterbirds are predicted. Both **Appendix 9-7: Baseline Report for Breeding Birds** of the ES **[APP-087]** and **Appendix 9-8: Baseline Report for Non-Breeding Birds** of the ES **[APP-089]** identify a range of red-listed bird species, i.e., those included on the 5th Birds of Conservation Concern red list, as present within the Order limits. These are also set out in **Table 9-11** within **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]**, with detailed assessment presented in **Table 9-15** and Section 9.9. Embedded mitigation measures are set out in Section 9.8 and **Table 9-13**. Enhancement generated by the Scheme is also set out in Section 9.10, with details set out in the **Framework**

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			ecosystems and the conservation status of habitats and species (including extent, abundance and distribution)". EN010142-000401-6.1%20Chapter%209%20Ecology%20and%20Nature%20Conservation.pdf 9.4.47 does not account for redistribution of deer or swans. There is a population of breeding swans on [redacted]. They use the river and surrounding areas. They are commonly observed in fields during the winter months. There is no mention of swans in any ecological reports. Swans are known to have a distinct lack of visual acuity (they commonly fly into overhead electricity wires). The glint and glare assessments only make reference to the potential impacts of sun – there is no reference to moonlight. Swans are at increased risk of harm due to misinterpretation of a swathe of solar panels which appear to be a body of water. This site combined with Cottam, West Burton and Gate Burton will have a visual detriment for migratory birds. The migratory corridor for many larger bird populations (swans, geese and duck etc) towards the Fens or Humber wetlands has not been addressed. *"Several studies have shown that solar PV panels (as opposed to Concentrated Solar Power (CSP)) have similar reflectance characteristics to water" (EN010142-000302- 6.2%20Appndx%2017-2%20Glint%20and%20Glare%20Assessment.pdf)* Since swans (or duck and geese) are not mentioned in any documentation, no risk has been identified or any mitigation proposed. This needs urgent remedy. Swans and deer are not accounted for in any ecological sense by Tillbridge solar although the impact to each will be enormous. I would urge a detailed assessment along a proposal for mitigation measures which can be implemented and maintained for the lifetime of the site.	**Landscape and Ecological Management Plan [EN010142/APP/7.17(Rev06)]** which is secured by Requirement 7 of the **draft DCO [EN0101412/APP/3.1(Rev07)]**. Deer do not meet the criteria set out in Section 9.4 of **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]** for consideration as an IEF and are therefore not specifically assessed in **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]**. However, whilst deer may feed on crops in arable fields, they generally use existing boundary features, such as hedgerows, ditches/field drains and woodlands for shelter and navigation across the landscape. The retention of much of these existing boundary features outside the security fencing will mean that existing connectivity will be maintained and, as such, there is not expected to be any change to how deer currently cross road networks. In summary, the Applicant has presented a detailed assessment of the impacts of the Scheme on biodiversity and embedded within the Scheme design appropriate mitigation measures, where required, along with an extensive package of habitat creation and enhancement. As a result, **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]** concludes that the Scheme will result in significant beneficial effects to broad-leaved woodland, running water, hedgerows and breeding birds, particularly farmland birds associated with hedgerows and field margins, as well as beneficial (but not significant) effects to standing water (e.g., ponds), scarce arable flora, terrestrial invertebrates, reptiles and amphibians, non-breeding birds, bats, Badger and other mammals, such as Brown Hare, Hedgehog and Harvest Mouse.
Q2.2.2	7000 Acres	Species Increase Post construction and during the operational phase the enclosed and protected nature of the site	There is no mention of the large deer population which is commonly observed throughout the 4 solar sites (Tillbridge, Cottam, West Burton and Gate Burton).	The Applicant refers to the response provided in the row above.

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		might give rise to population growth of a variety of species as has been noted at other significant sites of change from agriculture to a managed biodiversity site. What are the risks presented to the community by this potential growth and how does the Applicant propose to manage it to avoid it becoming a nuisance such as pests, or risk, such as collision with traffic?	Since deer are not taken into consideration within the ecological report there is a distinct lack of knowledge not only of the size and distribution of population but the direct impact that restrictions placed upon the deer will have to the surrounding areas. Fencing off large tracts of land (especially in combination with the other 3 solar sites) will have a consequence of increasing density in nearby areas. This will inevitably lead to more conflict simply by funnelling the deer towards highways. The result will lead to more fatalities of deer (and persons travelling within vehicles). There does not appear to be any mitigation proposed. There is a population of breeding swans on River Till. They use the river and surrounding areas. They are commonly observed in fields during the winter months. There is no mention of swans in any ecological reports. Swans are known to have a distinct lack of visual acuity (they commonly fly into overhead electricity wires). The glint and glare assessments only refer to the potential impacts of sun – there is no reference to moonlight. Swans are at increased risk of harm due to misinterpretation of a swathe of solar panels which appear to be a body of water. "Several studies have shown that solar PV panels (as opposed to Concentrated Solar Power (CSP)) have similar reflectance characteristics to water" (EN010142-000302-6.2%20Appndx%2017-2%20Glint%20and%20Glare%20Assessment.pdf) There is potential for swans to mistake vast tracts of solar panels for significant bodies of water. Since swans are not mentioned in any of the documentation there has been no risk identified, or mitigation proposed. This is an oversight which needs urgent remedy. Swans and deer are not accounted for in any ecological sense by Tillbridge solar although the impact to each is huge along with potential risks to humans due to collisions with traffic.	
Q2.5.1	WLDC	Cumulative Construction Period In responding to Q1.1.6 [REP3-067] WLDC provides justification to support its assertion that cumulative construction could last	WLDC position relates to the need to consider the potential cumulative construction as part of the planning balance. The ES serves as a supporting document to the decision making process. It applies standards or agreed methodologies to provide a report on the likely significant environmental effects. The manner in which	The scenarios considered within the planning balance when assessing the acceptability of impacts on local communities and environments have been informed by the assessment set out within **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev04)]**, as this reflects the reasonable worst-case scenario in line with PINS guidance (**Error! Reference source not found.**) and professional j

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		for ten years. However, the response also states: 'To confirm, WLDC does not object to the cumulative assessment in the Tillbridge ES'. How can this be the case when the assessment of cumulative effects contained within the ES [REP4- 015] is based on two scenarios, with the longest comprising a cumulative construction period of 5 years?	the Applicant has carried out its cumulative assessment reflects a typical approach; that is considering the impacts that would occur (in EIA terms) should all projects be constructed together, or in a back-to-back sequence. What is missing from this assessment is the scenario explained by WLDC where project construction is, in effect, 'staggered' so that activities are experienced over a longer period of time than that assessed. In raising no objections to the ES, WLDC is acknowledging that the Applicant's assessment reflects that of the scoping process and typical practice. WLDC has not sought to overtly criticise the assessment on these grounds, but has made representations to alert the ExA and SoS to a further scenario where the construction period for all projects could be longer than assessed. This potential scenario should be considered as part of the planning balance when assessing the acceptability of impacts on local communities and environments and/or whether all attempts to minimise these impacts have been made at the very least. With regard to residential amenity specifically, a focussed Residential Amenity Assessment applying established policy tests to impacts (which could sit outside of the ES) would have provided more helpful and contextual information upon which to base a decision. WLDC therefore retains its concern that the cumulative impacts of the four NSIP projects during construction and operation result in unacceptable impacts on the environment and communities. The situation is unique and the tipping point at which a decision maker could expect communities to accept harm has been breached.	udgement. It is not for the planning balance to introduce new potential scenarios or effects which have not been identified by technical experts or been identified as a reasonable scenario. The Applicant has set out its response to WLDC's concerns about the cumulative impacts of the four NSIP projects during construction and operation on the environment and communities and its comment regarding a Residential Amenity Assessment. The Applicant has set out its response to these points within **Table 5-1** of the **Applicant's Response to ExA's Second Written Questions [REP5-032]**, ref Q2.5.3 (pages 30 to 32), Q2.5.4 (page 32 to 33) and Q2.9.6 (page 50-51).
Q2.8.4	LCC	Fire fighting access and turning Lincolnshire Fire and Rescue Service have expressed a view to having alternative routes of access to the site for fire fighting to accommodate differing prevailing wind direction during and incidents and associated plumes.	LFR have been clear of the requirements for access to the site and we await further details from the applicant as to how they will satisfy the requirements of alternative access and egress routes.	The Applicant has shared the latest indicative site and BESS-Solar Station Compound access plans with LFR, the design principles for which are incorporated within the **Framework Battery Safety Management Plan (BSMP) [REP4-026]**. The Applicant met with LFR on 13 March 2025 to ensure that all LFR access requirements are accommodated, and all parties can sign off the indicative plans. There are no remaining matters of discussion to resolve with the LFR regarding the **Framework BSMP [REP4-026]**. As such, the **Statement of Common Ground with LCC [EN010142/APP/9.9(Rev03)]**

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		Can the Applicant advise how this is being addressed and also how adequate turning spaces and access for fire vehicles will be accommodated as per the requests?		reflects that all matters regarding the **Framework BSMP [REP4-026]** have been agreed with the LFR.
Q2.9.1	7000 Acres	Sequential views Could LCC and 7000 Acres please confirm whether they agree or disagree with the applicant's assertions on pages 15 to 16 of its Written Summary of Oral Submissions to the ISH3 [REP4-049] and in particular, the summary of professional judgement provided in relation to the likelihood of certain routes being used by higher-sensitivity recreational users (a-d)?	Professional Judgement – Ultimately a professional judgement is a subjective decision. Even though a professional and recognised process of establishing a judgement is utilised, the ultimate judgement is subjective. Therefore, in this instance if a professional is employed by the Applicant, it is arguable that the professional judgement of this said professional will be minded to represent the Applicants stand point and proposals. Also, theoretical evidence provided by professional judgements are not as valid as real and evidenced lived experiences. For instance; 'Mr Allin confirmed that professional judgements are based on reasoned understanding of the likely uses of the east to west rural roads, for example, some of which have value for residential receptors as a means of recreational route where there are no PRoW. Similarly, Mr Allin stated that reasoned judgements had been made in terms of speed of receptors using the A631, the relationships between settlements, the size and character of rural routes, whether PRoW exist and the proposals for all four DCOs combined cumulatively'. 7000 Acres disagree with Mr Allin's professional judgement of the recreational use such roads and enjoyment by passengers of the views along these routes in cars and other vehicles due to the lived and real experience of people who live in the area. More weight in terms of planning balance should not be afforded to a paid professional as opposed to a resident. Indeed, greater weight, it can be argued, should be afforded to evidence provided by residents as this is based on real data and material which can be measured and quantified (if appropriate studies and research were carried out prior to a NSIP Solar Projects being examined). Point a – use by higher-sensitivity recreational users – as a passenger in a vehicle the landscape both is observed in the immediate instance and sequentially.	The methodology for the LVIA has been accepted as appropriate by LCC, WLDC and BDC, as stated on page 18 of the **Written Summary of Applicant's Oral Submissions at the ISH3 [REP4-049]**. The Applicant considers this methodology to be robust and appropriate for the Scheme. The application of this methodology, informed by professional judgement, is an established basis for the preparation of LVIA and is in accordance with the on Landscape and Visual Impact Assessment (GLVIA3) (Ref. 4). Broadly, and as reflected in the methodology, judgements concerning value, susceptibility and sensitivity are made 'in the round' and reflect a range of contributory factors. These considerations are reflected in the baseline descriptions of value provided in **Appendix 12-4: LVIA Representative Viewpoint Descriptions** of the ES **[APP-104]** and those for susceptibility and subsequent sensitivity in **Appendix 12-6: LVIA Assessment of Landscape Effects** of the ES **[APP-105]**. With respect to Point a, passengers in cars are generally accorded a lower sensitivity through the LVIA methodology, but this does not preclude a higher sensitivity where other factors are apparent. These may include landscape or visual designations, which the Applicant has considered through the higher value accorded to viewpoints along Middle Street (due to the AGLV designation) and rural routes close to Hemswell, Harpswell and Glentworth, which are more likely to host village events and fetes and where value may be reflected in Neighbourhood Plans. Traffic speed will also be a product of magnitude of change, which the Applicant has also considered within the baseline. With respect to Point b, the Applicant maintains that the approach to judgements with respect to likely usage and value is appropriate. For example, the only reference to there being 'no onward route' within **Written Summary of Oral Submissions to the ISH3 [REP4-049]** is in relation to footpath Hems/782/2 and associated representative Viewpoint 13. The Applicant considers it reasonable to assume that this route, which leads only to a section of Middle Street with fast-moving traffic and no footway, should be accorded a lower value than PRoW Hems 19/2, which provides level access between the

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			Traffic often is lower in speed than the speed limit due to use by tractors, motorbikes, horses, cyclists etc. Village events and fetes in summer months means that traffic and activity on the rural roads off the A631 are used more than the Applicant's professional judgement has allowed (i.e. 'limited'). Point b – the recreational routes cited by the Applicant 'which are not considered to be attractive routes for recreational users' or 'provides no on-ward walking' etc misses the point. These routes although deemed by the Applicant's representative not to be valuable to them are exceptionally valuable and well used by residents. The Applicants representative sees little value in them as they do not live here. It is irrelevant to a resident that a route provides 'no on-ward walking' etc. as it is a route which is local to them and therefore readily useable and valued. Point c – the Applicant's mitigation of the significant affects on higher-sensitivity recreational users is dependent on tree planting being established at year 15. Woodland planting takes many years to establish. The timeframe stated is not realistic and the mitigation itself will detrimentally change the local landscape character area and wide, open views. Point d – There is a negative connotation projected onto travelling distances along unclassified roads by the Applicant's representative. Residents are well used to driving distances along and using unclassified roads in this area. It is part of rural life. The negative connotation conveyed by the Applicant's representative is not recognised or an issue for residents.	villages of Hemswell and Harpswell. In this instance, sensitivity for Viewpoint 13 is largely derived from the high value attributed to the expansive view from the adjacent property. Furthermore, it is the lack of any onward PRoW route south of Harpswell or north of Glentworth which underlines the community efforts to reinstate this link. With reference to the above, the Applicant notes that a high sensitivity has been accorded to representative viewpoint 10, close to the termination of the recently adopted restricted byway Heap/1170/1, despite the lack of an onward connection. Each viewpoint is considered on its own merits, in accordance with the LVIA methodology. With respect to Point c, the use of the Year 15 assessment stage and establishment of woodland or hedgerow mitigation is a widely used principle in LVIA. The Applicant acknowledges that mitigation through hedgerow and tree screening will result in a change in character in some representative viewpoints, but this change, in itself, is not a significant visual effect and should be considered in the context of benefits to green infrastructure, ecological corridors and the restoration of elements removed during agricultural intensification. With respect to Point d, as noted in the response to Point a, receptors in vehicles are generally accorded a lower sensitivity than those on foot, bicycle or horseback. This reflects the LVIA methodology and is not a negative connotation. Longer distances, as noted in **Written Summary of Applicant's Oral Submissions at the ISH3 [REP4-049]**, are considered to generally result longer intervals between views and thus are a contributing factor to the lower number of significant cumulative visual effects. In summary, the Applicant notes that not all receptors and associated viewpoints or routes can be of equal, or elevated value. The LVIA methodology and the judgement of sensitivity must reflect a range of factors, as stated above. A low sensitivity does not necessarily equate to an absence of recognised value; it is more frequently a reflection of local value on a relative scale. This approach does not, however, preclude local routes being of high value: the Applicant refers to the sensitivities accorded to the landscape, recreational routes and representative viewpoints associated with the PRoW and open space at Harpswell Hall stated in **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]**.
Q2.10.2 & Q2.10.3	LCC	Requirement 17	LCC has noted the Applicant's rationale for not proposing to monitor noise effects at receptors. The Applicant now proposes to provide sound emission data	The requirement for controlling noise monitoring at source is embedded within **Table 3-8** of the **Framework OEMP [EN010142/APP/7.9(Rev04)]**, which is secured through

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		In its written summary of oral submissions at ISH3 [REP4-049] the applicant states in part: 'Dr Muirhead, for the applicant responded to questions of clarification from the ExA, WLDC and LCC as to whether ongoing monitoring could be deployed once components were constructed and operational. He noted that this poses difficulties as such real-time monitoring can be inaccurate, due to the interference of background noise levels, particularly when monitoring at receptors some distance from plant (as opposed to monitoring at source). On this basis, the approach of using modelled data from final specifications (or monitored data at source from routine maintenance) is considered to be more accurate.' The ExA would like the applicant, LCC, WLDC and 7000 Acres to provide representations on the acceptability of a modification to requirement 17, which required noise monitoring at source? Particularly taking into account that the main problem with noise monitoring cited by the applicant relates to monitoring from receptors.	from the installed plant during the operational lifetime. As such, there would appear to be no reason why this proposal should not form part of requirement 17 to ensure that none of the monitored emission values exceed those assessed within the ES for the lifetime of the development as this would merely formalise the Applicant's current intentions	Requirement 13 of the **draft DCO [EN010142/APP/3.1(Rev07)]**. This includes the requirement that results of the sound monitoring of plant during the operational lifetime of the Scheme, carried out during regular maintenance checks, would be submitted to the relevant planning authority for review and further action taken, where required. As such, the commitment for regular operational noise monitoring is already secured through Requirement 13, and a separate addition to Requirement 17 is not necessary given it would duplicate the existing commitment.
Q2.10.2	WLDC	Requirement 17 In its written summary of oral submissions at ISH3 [REP4-049] the applicant states in part: 'Dr Muirhead, for the applicant responded to questions of clarification from the ExA, WLDC and LCC as to whether ongoing monitoring could be deployed once components were constructed and operational. He	WLDC maintains concerns regarding the approach to noise monitoring and the practical enforcement of Requirement 17 in the event of noise complaints. The purpose of 'requirement' 17 is to ensure the protection of residents at their properties from operational noise from the Tillbridge Solar Farm. The noise limits set out in Table 13-17 in Chapter 13 of the ES set the noise levels that are not to be exceeded at specific 'control' properties. It is these noise levels that require monitoring and investigation in the event a complaint is made from a resident. To measure noise	As clarified in the **Applicant's Response to the Examining Authority's Second Written Questions [REP5-032]**, Q2.10.2 and Q2.10.3, Requirement 17 must be met prior to construction of the Scheme. As such, measuring noise at individual properties does not relate to Requirement 17 as it would merely be a background sound survey. The purpose of Requirement 17 is to demonstrate, that the final design and components selected would not lead to higher noise levels at properties than the design presented during the Application process. Given the primary means to ensure lower noise levels is by plant selection and the location of plant (i.e. placing plant further from

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		noted that this poses difficulties as such real-time monitoring can be inaccurate, due to the interference of background noise levels, particularly when monitoring at receptors some distance from plant (as opposed to monitoring at source). On this basis, the approach of using modelled data from final specifications (or monitored data at source from routine maintenance) is considered to be more accurate.' The ExA would like the applicant, LCC, WLDC and 7000 Acres to provide representations on the acceptability of a modification to requirement 17, which required noise monitoring at source? Particularly taking into account that the main problem with noise monitoring cited by the applicant relates to monitoring from receptors.	against these levels, it appears rational to carry out measurements at the individual properties (the 'receptor') as opposed to, or in addition to, the source. Moreover, as WLDC understands, the 'source' noise levels are based upon the specification design for the infrastructure as applied to a model used to inform the noise assessment in the ES. If these measurements are to be adopted as the basis of controlling noise experienced by local residents, WLDC is concerned that there is a risk that they may not reflect the 'real' noise being experienced at those properties. Reliance upon design specification and modelling as opposed to an empirical 'in the field' measurement would not take account of the level of noise being experienced by a receptor. When measuring compliance with noise levels at a property, measuring noise at that property would be a rational requirement. In practice, the process will be initiated by a complaint by a property owner and measurements must be taken to establish, firstly, if the noise levels at that property are within acceptable limits. If not, then the source of the exceedance must be identified by measuring background (all projects turned off) and then turning on the nearest project to verify the source of the noise exceedance. This issue becomes of even higher importance when considering the cumulative position where noise from, for example, two solar farm projects are contributing to an exceedance of noise levels at a property. In order to ascertain which project is causing the 'harm', the only approach is to turn off the noise sources in total and in a combination. Such a situation is acknowledged by onshore wind farm developers and applied in their practice. Development Consent Orders made under the PA2008 (and those consented under the Town and Country Planning Act 1990) in relation to onshore wind farm projects have standard text included in the 'requirements'/conditions. These requirements provide for the turning off of the infrastructure to establish the baseline noise as well as measuring the source. As an example, the Clocaenog Forest Wind Farm Order 2014, include at 'requirement' 30-35 ('Noise) that: 31. Within 21 days from the receipt of a written request from the relevant planning authority and following a	receptors) it is appropriate that there is this check prior to construction commencing so that quieter plant or different locations for plant can be selected and constructed. It is therefore Requirement 13, with reference to the OEMP, not Requirement 17, that is the process "*adopted as the basis of controlling noise experienced by local residents*" from the Scheme once it is constructed and fully operational. This cannot be controlled directly through sound measurements at properties as the specific noise level of solar farm infrastructure is lower than the measured ambient sound level during day and evening periods at all measurement locations (see Table 13-12 and Table 13-17 of **Chapter 13: Noise and Vibration** of the ES **[AS-006]**). As such any exceedance likely would be the result of other sources in the local area such as road traffic or neighbourhood noise and the requirement is only concerned with preventing excessive noise from the Scheme infrastructure. By comparison, in the example provided of the Clocaenog Forest Wind Farm Order 2014, the proposed wind farm was directly resulting in *"a significant increase in the noise environment"* (see paragraph 4.129 of the Examining Authority's report to the Secretary of State). Some of the properties were also subject to cumulative operational noise levels greater than 40 dB from multiple wind farms being developed in the area. The baseline noise environment was also that of a quiet forest environment, which the Examining Authority found was "*quite different from that gained from the regular and mechanical noise produced by wind turbines*" (paragraph 4.1.26) and relied upon as a justification to set stricter noise limits. Generally, it is accepted that wind farms result in greater noise impacts than solar farms, and this is explicitly acknowledged in EN-3 (Ref. 3) and in the discussion within the Examining Authority's report to the Secretary of State for the Clocaenog Forest Wind Farm Order 2014. It is agreed that in theory, like in the Clocaenog Forest Wind Farm Order the interference of baseline ambient sound levels can be addressed by switching off all Scheme infrastructure to take comparative background sound measurements before switching all Scheme infrastructure back on for a comparative measurement. However, unlike in the Clocaenog Forest Wind Farm, applying such a requirement is highly disproportionate to the actual likely noise effects assessed for the Tillbridge Solar Project, for which no significant effects are identified. Shutting down all BESS units, inverters, solar panels and both substations for days at a time while comparative background sound surveys are carried out would be highly disruptive to the

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
			complaint to the relevant planning authority from the occupant of a dwelling which lawfully existed or had planning permission at the date this Order came into force, the undertaker must, at its own expense, employ an independent consultant approved by the relevant planning authority to assess the level of noise emissions from the authorised development at the complainant's property following the procedures described in the Noise Guidance in Part 4. 32. The undertaker must, if directed by the relevant planning authority, switch off any of the wind turbines in order to assess compliance with the noise limits. 33. The undertaker must provide to the relevant planning authority the independent consultant's assessment and conclusions regarding the noise complaint, including all calculations, audio recordings and the raw data upon which those assessments and conclusions are based. Such information must be provided within 3 months of the date of the written request of the relevant planning authority unless otherwise extended in writing by the relevant planning authority. 35-(1) No authorised development may commence until an assessment demonstrating that noise from the electrical substation on the site would not exceed a level of 30 dB LAeq at the 40 nearest residential property has been submitted to and approved in writing by the relevant planning authority. (2) The substation is to be constructed in accordance with the approved assessment. Values of the LA90,10min noise statistic shall be measured at the complainant's property using a sound level meter of EN 60651/BS EN 60804 Type 1, or EN 61672 Class 1 quality (or the replacement thereof) set to measure using a fast time A-weighted response as specified in BS EN 60651/BS EN 60804 or BS EN 61672-1 (or the equivalent UK adopted standard in force at the time of the measurements). This shall be calibrated in accordance with the procedure specified in BS 4142:1997 (or its replacement). These measurements shall be made in such a way that the requirements of paragraph 3 shall also be satisfied. Such a mechanism as the example set out above would enable a clear methodology to carry out a robust proper	operation of the Scheme. It would require careful planning, extensive coordination with grid operators, it could introduce risks to both grid stability and plant operations, and would not be justified for the sake of acquiring some noise levels at properties which would still be subject to uncertainties surrounding day-to-day fluctuations in background sound. The justification applied by the Examining Authority in the Clocaenog context for the stricter noise limits therefore does not apply. This is the primary reason why the **Framework OEMP [EN010142/APP/7.9(Rev04)]**, and the noise and operational management plan requirements adopted in all made Solar DCOs to date proposes the more proportionate and reasonable use of noise measurements at source. Additionally, by modelling the propagation element of the noise, levels at all local properties can quickly and easily be calculated under reasonably worst-case meteorological conditions and operational load conditions (dependent on weather conditions with more noise generated during hot days), therefore reducing the uncertainties encountered when monitoring. These uncertainties include the fact that weather conditions and background sound sources cannot be guaranteed to be the same when comparing the background measurement period to the with Scheme measurement period, as evidenced by the day-to-day variations in background sound reported in **Appendix 13-3: Baseline Noise Survey** of the ES **[APP-112]**. When it comes to cumulative impacts, the relative distances between properties and solar farm infrastructure (which are typically quite large) will dictate the likely source of the complaint or exceedance the vast majority of the time. This conclusion is supported by the fact that **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev04)]** only identified one property, R14, that would potentially be impacted by both the Tillbridge and Cottam operational noise and even then, not by a perceptible amount (see paragraph 18.14.14). In this instance, the results of the sound measurements taken as part of regular monitoring and maintenance, as described in **Table 3-8** of the **Framework OEMP [EN010142/APP/7.9(Rev04)]**, will provide evidence as to whether increases in noise from the Tillbridge Solar Project are the cause of the exceedance. In any case, the assessed potential cumulative impacts on this one receptor (R14) cannot be reasonably compared to those assessed in the Clocaenog Wind Farm context, where significant increases in noise at several receptors were assessed due to the cumulative impact of multiple operating wind farms.

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
			assessment of the noise source against the background and what is experienced at residential properties.	The ES assessment and modelling for direct and cumulative operational noise of the Scheme is robust, and it is reasonable for the Examining Authority to rely on it, with the appropriate checks applied by Requirement 17 and the **Framework OEMP [EN010142/APP/7.9(Rev04)]** monitoring measures secured by Requirement 13.
Q2.10.2	7000 Acres	Requirement 17 In its written summary of oral submissions at ISH3 [REP4-049] the applicant states in part: 'Dr Muirhead, for the applicant responded to questions of clarification from the ExA, WLDC and LCC as to whether ongoing monitoring could be deployed once components were constructed and operational. He noted that this poses difficulties as such real-time monitoring can be inaccurate, due to the interference of background noise levels, particularly when monitoring at receptors some distance from plant (as opposed to monitoring at source). On this basis, the approach of using modelled data from final specifications (or monitored data at source from routine maintenance) is considered to be more accurate.' The ExA would like the applicant, LCC, WLDC and 7000 Acres to provide representations on the acceptability of a modification to requirement 17, which required noise monitoring at source? Particularly taking into account that the main problem with noise monitoring cited by the applicant relates to monitoring from receptors.	The noise emitted by the overall scheme must be limited to an acceptable level and monitored. Merely monitoring the noise at source from the BESS will not take account of the noise emitted by other system components, such as transformer hum, or the HGV traffic noise associated with the scheme. Therefore, the total impact on receptors must be measured and monitored.	As described in the response to Q2.10.2 above, the operational noise emitted by the overall Scheme is controlled through Requirements 13 and 17 of the **draft DCO [EN010142/APP/3.1(Rev07)]** and incorporates all operational Scheme infrastructure, not just the BESS. HGV traffic noise associated with the Scheme will only occur during construction and decommissioning with measures to control this impact given in **Table 3-8** of the **Framework CEMP [REP5-015]** and **Framework DEMP [REP5-017]** which are secured through Requirements 12 and 20 of the **draft DCO [EN010142/APP/3.1(Rev07)]**.

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
Q2.10.3	WLDC	Requirement 17 In its written summary of oral submissions at ISH3 [REP4-049] the applicant states in part: 'The applicant has updated table 3-8 of the Framework OEMP [EN010142/APP/7.9(Rev03)] to clarify that results of the sound monitoring of plant during the operational lifetime of the Scheme, carried out during regular maintenance checks, would be submitted to the relevant planning authority for review and further action where required. This would act as evidence that the operational noise from the Scheme would not exceed throughout its lifetime. In other words, that the data that informed the operational noise assessment, completed at the detailed design stage to comply with Requirement 17, remained valid. The applicant understands from initial discussions that this amendment is likely to be acceptable to LCC.' The ExA would like the applicant, LCC, WLDC and 7000 Acres to provide a response to confirm the acceptability of incorporating this approach into Requirement 17 such that it is controlled and implemented effectively? At present requirement 17 only ensures that the proposed development is designed to operate at the noise levels set out in the ES, with no requirement for it to operate in accordance with the same details. The ExA is concerned that the applicant is placing far too much reliance on the modelling and proposed mitigation measures being	WLDC remain unclear about the rationale of the approach and does not have confidence that the amenity of residents will be protected. The Applicant's position is that monitoring should take place at the 'source' to measure compliance with noise levels based upon the equipment/plant specifications used in the assessment model. This approach relies upon the accuracy of the specifications and that the model will be wholly 'true' when the scheme is operational. This allows no ability to consider the actual noise levels from the source and what noise levels are being experienced as receptors. The key planning purpose of Requirement 17 is to protect amenity for residents at their properties (the 'receptors'). WLDC does not see why monitoring cannot be carried out at properties (or at an agreed proxy location in the event that property owners refuse access to carry out monitoring). The rationale of the Applicant is to seek to control the noise levels experienced at a receptor by monitoring at the source on the basis that this approach validates the approach to the assessment that identified those noise levels. Whilst this is a normal approach to producing a noise model to set those limits at each property, the purpose of a 'requirement' is to control the limits at those properties only. This naturally leads to measuring at those properties (receptors) to demonstrate compliance. The Applicant's approach would only be valid if there were absolute confidence that the specification data and model fully represent the conditions to be experienced on the ground entirely, and even then logic prevails that the noise levels at properties must also be recorded to ensure compliance with Requirement 17. WLDCs understanding is that the Applicant's approach is to control noise and deliver mitigation through the OEMP. In practice, this means that investigation of noise complaints against the noise levels controlled by Requirement 17 will be addressed through enforcement of the OEMP. WLDC considers this approach to lack clarity and precision, and requires the OEMP to be able to respond to any breaches of the noise levels controlled by Requirement 17. As written, WLDC does not consider that the fOEMP provides sufficient detail with regard to the process of noise monitoring to be	The rationale behind both Requirement 13 and Requirement 17 of the **draft DCO [EN010142/APP/3.1(Rev07)]** is given in the response to Q2.10.2 in **Applicant's Response to Examining Authority's Second Written Questions [REP5-032]**. In particular, **Table 3-8** of the **Framework OEMP [EN010142/APP/7.9(Rev04)]** commits to the submission of the results of regular noise monitoring to the relevant planning authority and the provision of appropriate mitigation, if required (to keep levels down to those presented in the ES), to be agreed with the relevant planning authority. It is therefore not correct to say there is no independent oversight of this process. It is not sensible, at this stage, to commit to any specific form this mitigation may take as it will depend on the circumstances of the exceedance. Measures could include repair and maintenance of the plant, sourcing quieter plant, barriers or enclosures, but the nature of the appropriate course of action will depend on the local circumstances such as the level of exceedance, distance to the receptor and cause of the noise. While the high-level approach to managing operational noise outlined in **Table 3-8** of the **Framework OEMP [EN010142/APP/7.9(Rev04)]** is consistent with the management of other effects, to which WLDC has not raised an issue, the Applicant has updated **Table 3-8** at Deadline 6 to allay some of the concerns raised. With respect to the definition of 'regular monitoring', paragraph 2.3.2 of the **Framework OEMP [EN010142/APP/7.9(Rev04)]** commits to annual maintenance checks and **Table 3-8** has been updated to clarify that sound monitoring would align with this schedule. **Table 3-8** of the **Framework OEMP [EN010142/APP/7.9(Rev04)]** has also been updated to clarify the procedure to be followed in the event of a noise complaint. Reference to 'materially worse' in **Table 3-8** of the **Framework OEMP [EN010142/APP/7.9(Rev04)]** is standard terminology within DCOs designed to acknowledge the uncertainties involved in ascertaining accurate levels at properties, whether through measurement or modelling, and committing the Applicant to provide mitigation in cases where it is clear noise levels from the Scheme are causing a breach of the levels presented in the ES. For example, ambient sound levels vary considerably day-to-day as a result of changes in traffic, weather and neighbourhood noise. As such, as evidenced by the data in **Appendix 13-3: Baseline Noise Survey** of the ES **[APP-112]**, local residents will regularly be exposed to levels in excess of those reported in the ES with the Scheme, even now without any solar farm infrastructure in place. It is therefore

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
		accurate and effective, respectively?	undertaken following complaints and how they would be remedied in the event that a complaint was justified. WLDCs position on the fOEMP Table 3-8 (REP4-023) with regard to controlling operational noise levels is set out further below: Requirement 13 requires the submission of an OEMP for the approval by the relevant planning authority. It must 'substantially in accordance' with the framework operational environmental management plan. The OEMP must be implemented as approved and maintained throughout the operation of the authorised developments. WLDC notes that Requirement 13 is a 'single' approval process. The OEMP is 'approved' before commissioning and there are no mechanisms for further review or amendment. There is therefore no scope to revisit and amend the OEMP following specific noise complaints. The fOEMP sets out controls for noise and vibration at Table 3-8 of Chapter 13 of the ES. The mitigation relates to design (specification/location of infrastructure). Monitoring states that staff will carry out 'regular monitoring', identifying changes in sound pitches or volume and carry out maintenance. WLDC is concerned that there are no details as to what 'regular' monitoring means in practice and how it will be undertaken. It does not set out or otherwise require that the results of the monitoring will be shared with WLDC. It states that the responsibility will be for the operator to determine whether the changes in noise levels are harmful or not. It makes no provision for any oversight by any other body. It is also not understood how judgements as to whether noise levels at receptors are being exceeded can be determined without knowing the actual levels that those properties are experiencing. If the 'design' specification and sound levels at source are as stated in the ES, but the noise levels at properties are being exceeded in practice, there is no obligation on the operator to mitigate those impacts. WLDC considers this situation unacceptable. There must be a mechanism to measure the noise levels at properties (receptors) and, regardless of the design specification stated in the ES, the operator must be obliged to implement a solution to reduce that harm to an acceptable level.	unrealistic to suggest that the levels reported in **Table 13-17** of **Chapter 13: Noise and Vibration** of the ES **[AS-006]** will never be exceeded in practice. It is merely the case that the Applicant is committing to noise from the Scheme itself not being 'materially worse' than the stated levels under reasonably worst-case weather conditions. Nevertheless, to avoid any perceived ambiguity over the definition of 'materially worse', the Applicant has removed this term from the latest version of the **Framework OEMP [EN010142/APP/7.9(Rev04)]**. The Applicant has added extra detail to the **Framework OEMP [EN010142/APP/7.9(Rev04)]** for the benefit of WLDC but it should be noted that, overall, the **Framework OEMP [EN010142/APP/7.9(Rev04)]** goes above and beyond the commitments of other solar farm DCOs in terms of noise monitoring and control. It is considered that the existing **Framework OEMP [EN010142/APP/7.9(Rev04)]** is suitably robust given there are not expected to be any significant noise effects and the levels being committed to are so low that measuring at properties is not effective due to Scheme infrastructure not being the dominant noise source at properties despite the quiet area in which the Scheme is located. With respect to cumulative effects the Applicant's position is provided in the response to Q2.10.2 in **Applicant's Response to Examining Authority's Second Written Questions [REP5-032]**. This is considered an adequate level of control given that only one receptor has been identified as potentially experiencing a cumulative effect and even then, not a noticeable one. In the event of a complaint from the resident the direction of the source of the noise will give a clear indication as to the Scheme to which the complaint pertains, and if it relates to Tillbridge Solar Project, the measures in the revised **Framework OEMP [EN010142/APP/7.9(Rev04)]** will be followed to determine the validity of the complaint.

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
			The fOEMP states that these measures will 'ensure that plant noise at sensitive receptors …is not materially worse that the levels presented in the ES'. WLDC does not agree with this level of confidence. The current approach to mitigation allows for a situation where noise limits at receptors are being exceeded, but the operator is able to point to the 'design' specification being as proposed and no further remedy is required. WLDC also has concerns on the statement of 'not materially worse than'. Requirement 17 controls operational noise to the specific levels set out in Table 13-17. There is therefore no discretion to make a judgement as to whether the noise levels are 'materially worse'. To do so would suggest that the noise limits in Table 13-7 can be exceeded, which would be unacceptable. Where the monitoring indicates an increase in noise levels, the fOEMP states that the undertaker and relevant planning authority will liaise in respect of any further maintenance or mitigations required to reduce levels at receptors back to those presented the ES. The Applicant states that further details are to be confirmed in the detailed OEMP(s). Leaving this matter open to discussion is not considered appropriate. WLDC wishes to see a clear process/methodology set out in fOEMP and/or a Requirement itself that is founded on the basis of mitigating the harm as quickly as possible. The current wording is dependent upon the operator monitoring at source, deciding at their own discretion as to whether noise levels are being 'materially' exceeded at sensitive properties (on the basis of noise at source not that being experienced by a resident) and only then seeking to engage with WLDC to determine the next course of action. This process is inadequate to ensure the noise levels specified in Table 13-17 are not exceeded and, in circumstances where they are exceeded, that a remedy can be applied swiftly before then identifying if there is a more fundamental issue at the noise source. WLDC consider it unacceptable to not have clarity and precision regarding how noise limits at sensitive properties will not be breached at the DCO decision making stage. Stating that the details will be presented later is unsatisfactory as, if the applicant considers this to be a matter than can readily be controlled, then	

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
			WLDC would expect these details to be provided in the application and draft documents. On the basis that the fOEMP is the enforceable mechanism to ensure compliance with noise levels required to not be exceeded through Requirement 17, WLDC has the following further comments: WLDC understood that the purpose of Requirement 17 was to ensure that noise levels set out in Table 13-17 are not breached. If breaches are reported by property owners, enforcement would be undertaken against Requirement 17 and not the OEMP. Notwithstanding that approach, the OEMP also does not provide any firm mechanism that sets out the process to be followed in the event of a complaint being made by a property owner. The current approach does not directly address the noise being experienced at source and does not specify the remedy options that would be applied beyond simply turning back to the scheme design/specification. This leaves a situation where, should the scheme design and modelling not be wholly accurate and properties experience an exceedance of their noise levels, there are no further obligation on the operator to mitigate that impact provided the scheme design is implemented as stated. In short, if the ES assessment turns out to be wrong in practice, there is little requirement for the operator to take any further actions to adhere to the noise levels. With regard to monitoring and resolving cumulative noise impacts: Neither Requirement 17 or Requirement 13 (the fOEMP) provide any process or methodology to address exceedances of noise levels at properties as a consequence of noise sources from more than one solar farm. WLDC wishes to see a clear methodology identified during examination (either within a 'Requirement' or a document to be referenced by a 'Requirement'. As example would be property reference R14 (residential property), which will experience cumulative noise impacts with the consented Cottam Solar Project. A further issue for the Tillbridge project relates to how it relates to the Cottam Solar Project and the scope of its	

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			DCO. Requirement 16 of that DCO only requires the operator to implement the mitigation measures set out in the supporting ES. The effect of this control approach is that the Cottam Solar Project is not required to meet any specific noise limits at specific properties. As a consequence, it can operate at higher levels than those predicted in the ES. WLDCs concern is therefore, for properties that will experience cumulative impacts from both projects, Cottam is able to operate with noise levels that are higher than has been used in the cumulative assessment in the Tillbridge ES. If this consequently results in the noise levels stated in the Tillbridge ES Table 13-17 being exceeded, it will fall upon Tillbridge to provide the remedy regardless of which project is the largest contributor to that exceedance. If this is the case, it highlights the importance of the Tillbridge DCO to set out clearly and precisely how noise complaints will be dealt with (including monitoring at source) and that the burden of lowering those levels site sits with Tillbridge. For information, the Cottam Solar Project operational noise 'Requirement' is set out below. Operational noise 16.—(1) No part of Work Nos. 1 to 4 may commence until an operational noise assessment containing details of how the design of that numbered work has incorporated the operational mitigation measures set out in Section 15.6 of Chapter 15 of the environmental statement for that part has been submitted to and approved by each relevant planning authority. (2) The design as described in the operational noise assessment must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates. WLDC therefore remains concerned that the process to be used to resolve noise complaints is not clear and, if followed, may not resolve breached of limits at properties. WLDC has been in discussions with the applicant through the SoCG process and will continue to do so to try and reach an agreed position.	
Q2.10.4	WLDC	Construction noise	The suggested wording relating to the process for investigating noise complaints set out in the response to	The **Framework CEMP [REP5-015]**, as secured by Requirement 12 of the **draft DCO [EN010142/APP/3.1(Rev07)]**, is the mechanism securing

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
		WLDCs summary of oral submissions at ISH3 [REP3-067] states in part: 'The requirement to identify a clear and efficient mechanism through DCO 'requirements' to deal with noise complaints is even more important to protect residential amenity due to the provisions of Article 7 of the dDCO, which provides the applicant with defence against claims of statutory nuisance. With this mechanism removed, local residents do not have the ability to resolve matters through the Environment Protection Act 1990, and it therefore falls to the DCO 'requirements' to ensure impacts can be remedied swiftly.' Could the applicant provide a response and indicate how this matter could be addressed through a requirement or other provision contained within the dDCO? Furthermore, could WLDC and LCC provide any suggested solution/wording to be contained within the DCO?	question 2.10.2 above is equally applicable to construction noise. A clear process that compels the developer to follow a methodology and reporting to establish noise levels being experienced at properties is required to ensure a consistent and efficient approach to complain investigation and resolution. With regard to Article 7 of the dDCO 'Defence to proceedings in respect of statutory nuisance', the Article could be amended to enable residents to make statutory nuisance claims to provide residents with this mechanism to resolve noise nuisance impacts.	construction noise mitigation and includes the commitment for construction noise monitoring. It also commits to regular meetings with other developers to minimise noise and vibration and the monitoring of noise complaints for immediate action and resolution. In addition, it includes controls for noise within section 2.5, which provides that consents would be sought under section 61 of the Control of Pollution Act 1974 (Ref. 5 would be obtained for works outside normal working hours. These consents would apply construction noise limits for nearby noise sensitive receptors and in accordance with any other restrictions agreed with the relevant planning authorities. The suggestion that Article 7 be amended to enable statutory nuisance claims is not accepted by the Applicant. This is a well-accepted and standard draft DCO article and aligns with the approach enabled in the Planning Act in respect of setting aside statutory nuisance liability in favour of controls within the draft DCO itself. The Applicant considers the complaints and action process through the **Framework CEMP [REP5-015]**, whereby the undertaker will need to address any complaints raised through immediate action and resolution via new mitigation if necessary, provides a much more approachable, direct, timely and cost-effective means of resolving noise issues for local residents than pursuing legal action through a statutory nuisance claim.
Q2.13.5	WLDC	FCTMP The applicant's response to Q1.13.12 [REP3-062] is noted. However, many of these comments appear to relate to other projects. It is understood that the Council has concerns with regard to the need for a co-ordinated approach to construction. WLDCs response refers to the need for *'designation of a single co-ordinator to manage construction traffic for each project.'*	WLDC has raised this issue during the examinations of the other solar NSIP projects. The Applicants' responses have been directed towards the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects (JRI) as evidence that collaboration will occur during the construction phase. As previously submitted, the JRI does not constitute an enforceable commitment to collaborative working. It is not required to be delivered through a DCO 'requirement' and does not constitute a 'Certified Document'. As a consequence, there remains a vacuum and uncommitted approach to joint working between the developers to minimise cumulative impacts on	The Applicant has provided a response to this matter within **Table 2-1** of the **Applicant's Comments on Interested Parties Submissions to the First Written Questions at Deadline 3 [REP4-048]**, ref Q1.13.12 and **Table 14-1** of the **Applicant's Response to ExA's Second Written Questions [REP5-032]**, ref Q2.13.4. In respect of the suggestion that the developers for the Tillbridge Solar Project, Gate Burton Energy Park, Cottam Solar Project and West Burton Solar Project enter into a Unilateral Undertaking pursuant to section 106 of the Town and Country Planning Act 1990 (Ref. 6), the Applicant refers to the reasons provided within **Table 2-1** of the **Applicant's Comments on Interested Parties Submissions to the First Written Questions at Deadline 3 [REP4-048]** explaining why a requirement which enforces a Joint Cooperation agreement or

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
		However, in practice does the Council consider that this can be achieved and enforced bearing in mind the content of the CTMPs and DCOs for other consented projects (Gate Burton, Cottam and West Burton)?	communities and the environment during the construction phase. There remains an option to secure the effecting mitigation of cumulative construction traffic through the developers for the Tillbridge Solar Project, Gate Burton Energy Park, Cottam Solar Project and West Burton Solar Project could enter into a Unilateral Undertaking pursuant to section 106 of the Town and Country Planning Act 1990 to secure a co-ordinated approach to construction traffic. This could be used to commit the parties to the JRI and respective Construction Traffic Management Plans. As the developers already proclaim to have a collaborative relationship through the JRI, there could be potential to execute a UU to give the JRI a binding and enforceable standing.	Joint Management Plans would be inappropriate, which are equally applicable in respect of a Unilateral Undertaking.
Q2.13.8	WLDC	Potentially Sensitive Receptors Paragraph 9.11 of WLDCs LIR [REP1A-005] asserts that no data is provided regarding the potentially sensitive receptors within the Study Area. Could the Council please expand on this point and explain whether it is alluding to anything in particular when it refers to 'sensitive receptors'?	Comments contained within paragraph 9.11 of WLDCs LIR relate to driver delay during construction and seeks confirmation regarding the consideration of potentially sensitive receptors within the Study Area. The 'sensitive receptors' referred to by WLDC relate to those identified in the IEMA Guidance for Environmental Assessment of Traffic and Movement (2023) (IEMA Guidance). The IEMA Guidance defines 'Affected parties/sensitive receptors' as the following user groups (para. 1.28) a. Non-motorised users b. Public rights of way users c. Motorists and freight vehicles d. Public transport e. Emergency services The Applicant's ES, Chapter 16 (para. 16.4.61-16.4.67), describes the approach for 'Sensitivity of Receptors' for driver delay severance and road safety, however does not set out who the receptors specifically are and what sensitivity has been attributed to them. Table 16-19 sets out 'sensitivity' to the receptor as defined by a highway location, but does not explain how that is arrived at with regard to the IEMA Guidance para.1.28 list. This matter is of particular importance due to the specific character of the West Lindsey District with regard to how the highways are used. As discussed during the ISHs, there is not an extensive network of	WLDC's comments relate specifically to Driver Delay and how sensitive receptors have been determined. The IEMA Guidance (Ref. 7) relates to multiple potential sources of traffic and transport impacts arising from construction stage activities. The list in para 1.28 of the IEMA Guidance is of user groups which should be considered. This applies across the range of potential impacts, and is not a list specifically for driver delay. Clearly, the sensitive receptors for driver delay are motorists and freight vehicles. Paragraph 1.29 of the IEMA Guidance which follows sets out that defining the list of sensitive receptors should be informed by consultation with Local Planning and Highways Authorities. This has been followed by the Applicant, which agreed with LCC and NCC the list of sensitive receptors at EIA Scoping Stage. The Applicant recognises that highways locations themselves are not sensitive receptors, and that the receptors themselves are the list of user groups in Paragraph 1.28. Paragraph 1.31 states "*The sensitive receptors within the agreed study area should be assigned to the nearest highway link, and the relationship with the highway environment examined to understand the sensitivity of those receptors to change.*" This is the process which has been followed. Paragraphs 16.4.61 to 16.4.63 of **Chapter 16: Transport and Access** of the ES **[APP-013]** set out the criteria by which sensitivity would be applied to receptors, and that driver delay assessments would be carried out where junction capacity analysis is required. As explained in 16.8.12 and 16.8.13, it has been agreed with LCC and NCC that the impacts of the

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
			public rights of way in the form of public footpaths and bridleways for non-motorised traffic and recreation. This results in local communities using the highways used by vehicular traffic for recreation and non-motorised travel modes. As a consequence, there are limited alternatives for those users when roads are subject to controls during construction, and the impact of additional traffic causing fear, reduced amenity and severance. Understanding how sensitivity has been attributed in light of the specific characteristics of West Lindsey is important to validate the assessed impacts.	Scheme do not require junction modelling, and therefore no further driver delay assessment is required. Paragraphs 16.4.64-67 of **Chapter 16: Transport and Access** of the ES **[APP-013]** explain how sensitivity is applied to receptors in terms of assessing other potential traffic and transport impacts. Highway receptor sensitivity is set out and justified for each link in **Table 16-19**. Identification of sensitivity in terms of road safety is set out and explained in 16.8.29-31. Sensitivity for PRoW Receptors is set out and justified in **Table 16-23**. As such, the specific characteristics of the receptors and the local area have been taken account of in the assessment.
Q2.13.9	WLDC	WLDC LIR Please could the Council provide a response to the applicant's responses to the WLDC LIR [REP3-061] in relation to Transport and Access?	WLDC provide a response below to each response made by the Applicant in REP3-061. Summary: The comments of the Applicant are noted. Driver delay: construction WLDCs concern related to providing clarity on the identification of 'sensitive receptors' and the subsequent sensitivity attributed to them. This has been set out in WLDCs response to Q2.13.8 above. The Applicant's response does not specifically answer the question raised by WLDC and repeats statements from the ES. Construction: severance This matter again relates to the identification of 'sensitive receptors' with regard to severance for pedestrians causing delay, and non-motorised user amenity. The Applicant's response direct the reader to the ES chapter only. WLDCs concern relates to the sensitivity of people using the highway network for recreation and nonmotorised traffic in their day-to-day lives, and how the Applicant has had regard to that in their assessment. Construction: fear and intimidation WLDCs concern again links to matters described above and in Q2.13.8. Construction: proposed mitigation The Applicant agrees with WLDC that there is a significant adverse effect on the B1241 (ATC23) on a route that passes a primary school. The Applicant appears to agree that no mitigation has been proposed	The points in respect of driver delay, severance and fear and intimidation during construction have been explained in the response to Q2.13.8 above. <u>Construction: proposed mitigation</u> It is not the case that no mitigation has been proposed for the impacts on B1241 (ATC23). Extensive embedded mitigation is secured through the **Framework CTMP [REP5-019]**. In Q2.13.11 the Examining Authority asked the Applicant to consider additional mitigation for ATC23. The Applicant has provided a response to the ExA in the **Applicant's Response to ExA's Second Written Questions [REP5-032]**, ref Q2.13.11. This includes a commitment to further mitigation, which has been incorporated into the **Framework CTMP [REP5-019]** at Deadline 5. <u>Requirement 14 – construction traffic management plan</u> The Applicant's response is set out under Q2.13.5 within this document.

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
			on the basis that the impact will be short term and temporary. WLDC maintains its view that the Applicant should have considered further mitigation due to the proximity to a primary school and does not agree that relying on short term impacts to avoid doing so represents a responsible approach to construction. Construction: cumulative The Applicant's comments are noted. WLDC agree that the fPRoW Management Plan is the appropriate mechanism to control these impacts. Requirement 14 – construction traffic management plan WLDC note the Applicant's comments. The area of disagreement relates to the absence of an enforceable approach to implement a collaborative and co-ordinated construction traffic management plan with other cumulative projects.	
Q2.14.1	Environment Agency	The Applicant's previous replies indicate that the reservoir used adjacent to the proposed development is for the storage of digestate for an agricultural business. Can the Applicant advise if the potential for breach of this reservoir has been considered within their flood risk assessment and the likely consequence should this to occur?	We note that the applicant's reply to Q1.14.6 in December 2024 to your first set of questions says 'Figure 10-1 of the ES [APP-167] shows one square water reservoir within the Principal Site. This is a cesspit for digestate of an adjacent farm business and has been assumed to remain in use by that farm business throughout the lifecycle of the Scheme. The reservoirs adjacent to the Order limits are assumed to be for irrigation purposes. The flood risk assessment in Appendix 10-3: Flood Risk Assessment of the ES [EN010142/APP/6.2(Rev01)] assesses flood risk from all sources, including reservoir flood risk. The Environment Agency online mapping (Ref 1-52) for reservoir flood risk includes flood risk from these reservoirs. The Scheme is not impacted by flooding from the reservoirs and does not increase flood risk from reservoirs elsewhere'. We see that the applicant refers to the reservoir that is used for the storage of digestate as being within the principal site whereas you refer to it as being adjacent to the proposed development in your question. However, we assume this is the same reservoir because it is the only one we can find in the applicant's previous replies as being referred to as used for the storage of digestate. We also note the applicant describes it as a square reservoir. We have located a reservoir which seems to fit this description in Figure 10-1 of the Environmental	Note the 'square reservoir' has been referred to as the 'lagoon' in the response below, as it does not meet the definition of a reservoir in accordance with the Reservoirs Act 1975 (Ref. 8). **Regulatory Compliance**: In accordance with the UK Government guidance (Ref. 9), the storage of digestate within the lagoon must adhere to a 750mm freeboard requirement between the water level and the earth embankment to ensure safety and compliance. The environmental permit for the Hemswell Cliff Anaerobic Digestion facility also specifies this 750mm freeboard requirement. Considering the lowest crest height of embankment of 25.50m AOD around the reservoir, the maximum allowable digestate level is assumed to be 24.75m AOD. The lowest level of the downward toe of the embankment is recorded at 24.00m AOD at the north-western and northern edges of the reservoir, which means that, in the event of a breach, the maximum depth of overflow at the embankment toe would be 0.75m. **Potential Breach Locations**: The southern, eastern, and south-western embankments are raised approximately 0.5m above ground level, with the lowest downward toe level at 25.50m AOD.

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
			Statement (Surface Water Features and Their Attributes). It is marked by a yellow circle with a black border in the North East corner, just South West of Hemswell. We have calculated this to have Grid Reference SK9143589764. Taking all of the above into account, our reply to your question is based on it being this reservoir that you are asking about. We are aware that, in our response to Q1. 14.6 of your first set of questions, in our letter of 09 December 2024, we previously accepted the applicant's reply to this question including the statement that 'the Environment Agency online mapping (Ref 1-52) for reservoir flood risk includes flood risk from these reservoirs'. However, we have reviewed the situation in the light that this matter has been raised again. The Environment Agency holds records of large, raised reservoirs holding 25,000 cubic metres or more of water above natural ground level. We have checked and this reservoir is not included on our records. If the reservoir does have a capacity over 25,000 cubic metres the reservoir should be registered with the Environment Agency. The area of the reservoir, as measured from Ordnance Survey mapping, appears to be approximately 11471.68 m2 so it would need to have a height of around 2.5m to take it over the 25,000m3 threshold. As the reservoir is not included in our records, it has not been included in the national reservoir breach mapping project. Therefore, the statement by the applicant that this reservoir has been included in the Environment Agency breach mapping is not correct. The risk posed by this reservoir will depend on the quantity of water/liquid stored above the natural ground level of the land. We have made the applicant's consultants aware of our latest position and it is understood that they will commenting on this, including the capacity of the reservoir, in their reply to this question.	Since the maximum digestate level remains at 24.75m AOD, these embankments would not experience overtopping or breach, as the surrounding ground is at, or above, this level. However, potential breach scenarios have been specifically assessed for the north-western and northern embankments, as they contain the lowest crest level at 25.50 mAOD. These areas present the most likely locations where a breach could occur, particularly under a worst-case flow path scenario. **Risk of Breach** If a breach were to occur, the digestate would flow between PV fields 58 and 59, following the natural contours of the land towards a nearby pond and an adjacent watercourse located to the west. Please refer to **Appendix A** of this document, for reference. Importantly, the BESS area within PV field 58 would remain unaffected, as the anticipated flow path would bypass this infrastructure. As the digestate passes across the edge of solar PV field 59, it is unlikely to cause damage to the solar panels, as they are mounted with a minimum clearance of 600mm from the ground. Given that the digestate would spread and dissipate quickly, the risk of inundation to the panels remains minimal. Additionally, a watercourse running parallel to the BESS in PV field 58 would serve as a natural interception point, carrying any overflow towards the primary watercourse to the west. **Integrity of the Lagoon Structure**: The lagoon is constructed with an impermeable liner covering both the base and sidewalls, ensuring that any stored digestate remains contained and does not seep into the surrounding environment. The Environmental Permit imposes strict maintenance and monitoring obligations, requiring that the liner and embankments be regularly inspected and kept in good condition throughout the lagoon's operational lifespan. If the lagoon embankment were to fail, the environmental damage would, in consideration, be far more damaging to the environment and it would be in the interest of the lagoon operator to ensure this does not occur. **Reservoirs Act 1975** Regarding the statutory reservoir size; the volume which clarifies the statutory volume within the Reservoirs Act (Ref. 8) is the volume of water above the lowest external ground level at

ExQ2	IP Name	ExA's Question	Interested Party's Response at Deadline 5	Applicants Response at Deadline 6
				the embankment toe. Applying a conservative approach, the maximum depth of the lagoon (excluding freeboard) above this level is 1.50m; an area of approximately 1.1 ha would provide a maximum volume of 16,500m^3; this would not fall within the current statutory limit of 25,000m^3, but could fall within the lower limit of 10,000m^3 if Schedule 4 of the Flood and Water Management Act (Ref. 10) is brought into law in the future. In summary, given the assessed overland flow paths for the breach, and a very low likelihood of a breach of the digestate lagoon, the residual flood risk to the solar panels and associated infrastructure is considered very low, with no mitigation required. Whilst the Scheme would not be affected by flooding in the unlikely event of a breach of the lagoon, the Applicant does note that as an additional safeguard, the Scheme will be able to function in a modular way. That is, if any parts of the PV areas were affected by flood waters in exceptional circumstances, the substations and BESS-Solar Station Compounds can continue to function safely.

3. References

Ref. 1 Lincolnshire County Council (2023). Central Lincolnshire Local Plan. Accessed on 23/03/2025 at: https://www.n-kesteven.gov.uk/central-lincolnshire/adopted-local-plan-2023

Ref. 2 Planning Inspectorate (2025). Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. Access on 26/03/2025 at https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment

Ref. 3 Department for Energy Security and Net Zero (2024). National Policy Statement for renewable energy infrastructure (EN-3). Accessed on 26/03/2025 at https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3

Ref. 4 Landscape Institute and Institute of Environmental Management and Assessment (2013). Guidelines for Landscape and Visual Impact Assessment: Third Edition (GLVIA3). Landscape Institute, London.

Ref. 5 Stationary Office (1974) Control of Pollution Act 1974. Accessed on 26/03/2025 at: https://www.legislation.gov.uk/ukpga/1974/40/contents

Ref. 6 Stationary Office (1990). Town and Country Planning Act 1990. Accessed on 26/03/2025 at: https://www.legislation.gov.uk/ukpga/1990/8/contents

Ref. 7 IEMA (2023). Environmental Assessment of Traffic and Movement. Accessed on 26/03/2025 at: https://www.iema.net/resources/blogs/2023/07/12/iema-guidance-ea-of-traffic-and-movement/

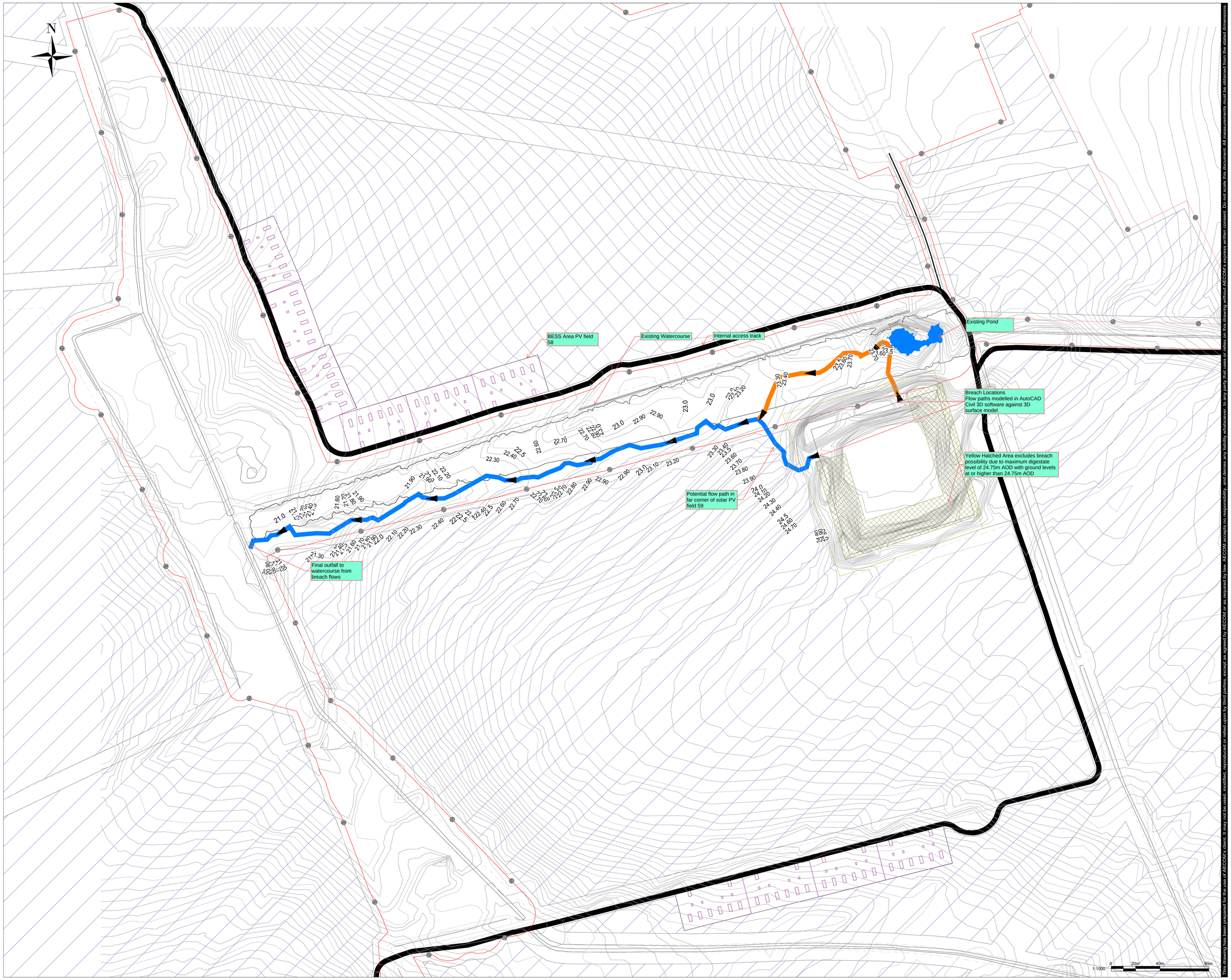
Ref. 8 Stationary Office (1975). Reservoirs Act 1975. Accessed on 26/03/2025 at https://www.legislation.gov.uk/ukpga/1975/23

Ref. 9 Defra and EA (2023) Storing silage, slurry and agricultural fuel oil. Accessed on 26/03/2025 at https://www.gov.uk/guidance/storing-silage-slurry-and-agricultural-fuel-oil

Ref. 10 Stationary Office (2010). Flood and Water Management Act 2010. Accessed on 26/03/2025 at https://www.legislation.gov.uk/ukpga/2010/29/contents

Appendix A : Lagoon Breach Levels Review

A- 1 Drawing 60682158-ACM-ZZ-XX-SK-CE-0102 Lagoon breach levels review



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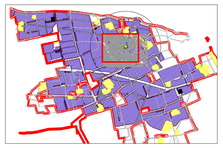
Notes

1. DO NOT SCALE FROM THIS DRAWING
2. ALL LEVELS SHOWN ARE IN METERS ABOVE ORDNANCE DATUM (AOD) UNLESS STATED OTHERWISE
3. SITE LEVELS AND WATERCOURSE LOCATIONS BASED ON TOPOGRAPHIC SURVEYS 'GRETA-II_UAV-TOPO_LINEWORK_OSGB36_ODN_REV1_2022-12-12' AND 'TILBRIDGE-GRETA-II_UAV-TOPO_LINEWORK_OSGB36_ODN_REV1_2023-08-09' BY ABOVE SURVEYING LTD.'
4. SITE BACKGROUND TAKEN FROM OS BASE MAP DATASET AND SHOULD NOT BE USED FOR DETAILED DESIGN PURPOSES
5. SITE LAYOUT BASED ON FIGURE 3-1: INDICATIVE PRINCIPAL SITE LAYOUT PLAN OF THE ENVIRONMENTAL STATEMENT [EN010142/APP/6.3]
6. THE INFORMATION ON THIS PLAN IS GIVEN WITHOUT OBLIGATION OR WARRANTY. NO LIABILITY OF ANY KIND WHATSOEVER IS ACCEPTED BY AECOM FOR ANY ERRORS OR OMISSIONS. DRAINAGE STRATEGY DESIGN INDICATIVE AND SUBJECT TO CHANGE.

ISSUE/REVISION

I/R	DATE	DESCRIPTION
P01	11.03.2025	FOR EIA



Purpose Of Issue

FOR INFORMATION

Project Number

60682158

Sheet Title

APPENDIX A
LAGOON BREACH LEVELS REVIEW

Reference Number

Legislation Reference

Sheet Number

60682158-ACM-ZZ-XX-SK-CE-0102

Scale: As shown @ A0 **Rev:** P01