

TILLBRIDGE SOLAR PROJECT

WEST LINDSEY DISTRICT COUNCIL

APPLICANT RESPONSES TO ExA's SECOND WRITTEN QUESTIONS

WLDC Comments

Question Number		Applicant Response	WLDC comments
Q2.14	<p>Planning Balance</p> <p>Please can the Applicant produce a calculation and illustration indicating the extent of land within a 5 mile radius of the site, its land use broken down into urban, rural and solar to enable the degree of local saturation of the landscape to solar development and using where possible Natural England landscape descriptors to help describe the scale of change before and after in area.</p>	<p>Appendix A of this document includes a figure showing the extent of land within a 5 mile radius of the Principal Site broken down into urban, rural and solar land use. It also includes the Natural England National Character Areas. Urban land has been defined using the adopted Central Lincolnshire Local Plan (Ref 1-27) with reference to Policy S1: The Spatial Strategy and Settlement Hierarchy. This confirms that the urban areas within Central Lincolnshire are Lincoln, Sleaford, Gainsborough, Caistor and Market Rasen. Only part of the urban area of Gainsborough falls within the 5 mile radius of the Principal Site.</p> <p>Data relating to solar has been derived using the Planning Inspectorate's National Infrastructure Planning webpage to confirm the location and extent of solar NSIPs and the use of the Department for Energy Security & Net Zero Renewable Energy Planning Database (October 2024 (Q3) (Ref 1- 28) to confirm</p>	<p>Appendix A serves as a helpful illustration of the cumulative impacts that the four NSIP solar projects would have in terms of landscape character change.</p> <p>WLDC notes that the nominal 5 mile radius from the centre of the Tillbridge site excludes significant areas of solar development associated with other projects, but that these would be included had a slightly larger radius been applied.</p> <p>The radius also omits the impact of West Burton located a short distance to the south, which would add greater</p>

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	<p>ground mounted solar projects within a 5 mile radius of the Principal Site. All solar NSIPs have been included within the 5 mile radius of the Principal Site. With respect to projects determined under The Town and Country Planning Act, projects were included in the Applicant's search where planning permission has been submitted (including EiA screening), granted or an appeal allowed. Projects that are under construction and operational were also included in the search. In addition, the Applicant reviewed the relevant local planning authorities planning portal and mapping services to confirm whether any further applications have been submitted since October 2024 to ensure that the latest position is captured. No TCPA solar projects been identified within the 5 mile radius of the Principal Site.</p> <p>Of the 20,341.38 hectares of land within a 5 mile radius of the Principal Site, 18,287.92 hectares is rural land, 270.58 hectares is urban land and 1,782.88 hectares would constitute ground mounted solar if all NSIPs are constructed. This demonstrates that 89.91% of the land within a 5 mile radius of the Principal Site would remain as rural land, with only 8.76% of land within a 5 mile radius of the Principal Site comprising ground mounted solar if all projects are delivered. 1.33% of the land would constitute urban land forming part of Gainsborough.</p> <p>The area within a 5 mile radius of the Principal Site would therefore retain its primarily rural character, with solar development only comprising 8.76% of land within this area. This illustrates that the scale of change is low with the area retaining most of its existing rural land use and countryside within a 5 mile radius of the</p>	<p>harm in terms of visual effects and landscape character.</p> <p>Appendix demonstrates the harm that will be caused cumulatively with other projects (which in WLDCs view is the basis on which the Scheme must be determined). The experience travelling through the area will be one of significant and harmful landscape character change through the presence of e alien solar farm infrastructure within the current landscape character. The extent of cumulative harm to landscape character and visual effects is considered unacceptable by WLDC.</p> <p>Considering Appendix A alongside Appendix F is also very helpful to demonstrate the significant cumulative impacts that would be caused. The ZTV notably demonstrates that the adverse landscape character impacts will be experienced along the length of 'The Cliff' LCA/AGLV. As the most prominent and sensitive landscape feature, the harm caused to this valued AGLV should be given negative weight in the planning balance.</p>

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		<p>Principal Site.</p> <p>Two National Character Areas fall within a 5 mile radius of the Principal Site. This includes NCA 45: Northern Lincolnshire Edge with Coversands and 48: Trent and Belvoir Vales. The total area of land within NCA 45 is 50,057.68 hectares and NCA 48 is 177,604.75 hectares resulting in a combined total area of 227,662.43 hectares. The total area of solar projects within a 5 mile radius of the Principal Site comprises 1,782.88 hectares with this constituting 0.78% of the combined NCA area. This helps to further demonstrate that the scale of change following the implementation of the Scheme and other solar NSIPs is minimal and will not result in a material impact/change within the wider NCA areas.</p>	
Q2.1.6	<p>Shared Management Plans</p> <p>The ExA notes the applicant's response to Q1.1.14 [REP3-062]. Taking this into account, what weight can the ExA place on the reference to a joint Construction Traffic Management Plan (CTMP) and to what extent is the ES predicated on joint construction traffic measures which would be controlled by a joint CTMP?</p>	<p>Paragraph 1.3.4 of the Framework CTMP [EN010142/APP/7.11(Rev05)] sets out that a Joint CTMP could be prepared between the Scheme and the other solar DCOs post-consent once further details are known with respect to project timeframes to manage and further mitigate construction traffic impacts. Whilst the draft DCO [EN010142/APP/3.1(Rev06)] cannot control the other schemes, the Applicant has demonstrated that it is committed to working with the other developers on joint mitigation. This includes a Joint CTMP in relation to the shared Cable Route Corridor should this be practicable. This is secured, as far as possible, through requirement 14 of the draft DCO [EN010142/APP/3.1(Rev06)] which requires the submission and approval of a CTMP that is substantially in accordance with the Framework CTMP [EN010142/APP/7.11(Rev05)]. The Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP3-032] updated at Deadline</p>	<p>The response from the Applicant demonstrates the concerns raised by WLDC.</p> <p>There is no formal or binding commitment for the four solar farm developers to work collaboratively.</p> <p>The Applicant states that the LPAs will have an opportunity to encourage collaboration when discharging Requirement 14. In practice, this would only be possible should all CTMPs be submitted as the same time. If overlapping submissions were made, this would make it very challenging for WLDC to bring developers together to deliver</p>

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	<p>3 also demonstrates the Applicant's commitment to cooperation, since it includes a signed cooperation agreement at Appendix C [APP-216]. Whilst a side agreement that falls outside of the DCO process, it demonstrates that there is an agreement in place for all parties to cooperate with each other and to act reasonably and in good faith to mitigate adverse impacts (clause 4.1.2).</p> <p>The Applicant has done as much as it can within the legislative framework available to support joint working if/as the projects progress to the construction phase. The CTMP would need to be approved by the Local Highway Authorities in accordance with requirement 14 of the draft DCO [EN010142/APP/3.1(Rev06)]. Should construction programmes of the projects overlap, the Local Highway Authority, as the relevant planning authority, would have the ability to encourage further collaboration and control in its assessment of the CTMP and ultimately the discharge of requirement 14.</p> <p>In view of the above, the provisions set out within the Framework CTMP [EN010142/APP/7.11(Rev05)] and additional control afforded by the cooperation agreement are relevant and material to decision making. These measures and controls do have some weight, but cannot be fully relied upon. This approach was accepted by the Examination Authority in its recommendation report into the Gate Burton Energy Park and accepted by the Secretary of State. Paragraph 3.12.68 of the ExA recommendation report stated that:</p> <p><i>"In terms of a mechanism to control or require a joint CTMP I agree with the</i></p>	<p>collaboratively given the tight timescales for approval and the enforced 'deemed consent' provisions. Furthermore, if one project submits in advance of others, it could claim that there is no guarantee those projects will be implemented and WLDC would be obliged to determining those details for the project on its own.</p> <p>For the above reason, WLDC reiterates its requirement for sufficient timescales to consider and determine DCO 'requirements'. The Applicant acknowledges in its response that there is a greater role for WLDC beyond simply discharging 'requirements'; it is being left to WLDC to consider all cumulative submissions and seek to negotiate with all Applicants to secure a conjoined approach at that stage.</p> <p>It remains disappointing to WLDC that the developers have not made further attempts to propose a conjoined combined approach to delivering the projects, which will have significant impacts on the environment and communities for a number of years.</p>

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	<p><i>Applicant that this DCO cannot seek to control the actions of the developers of the other schemes. It is therefore not appropriate to require the Applicant to produce such a document. I am, however, conscious of the Applicant's commitment to collaborative working as addressed in [REP6-041] and which is further evidenced by the cooperation agreement signed between the various developers, a copy of which is included in the appendices of that document. Whilst these are only aspirational or matters that could be amended, or indeed the parties agree to remove the agreement they are at present in place and are material and relevant as are the actions of the developers to date including in terms of cooperating on the common GCC. I am further persuaded that changes to the fCTMP which include commitments to the matters to be included in the detailed CTMP and a commitment to explore the potential for a joint CTMP once further detail on the progress of the other schemes evolves post consent, gives further weight to this. Overall, whilst firm binding commitments cannot be made or included, the Applicant has gone as far as it can to include in the documentation the opportunity to facilitate the joint working and these would be considerations available to the Highway Authorities when they consider the Approval of the</i></p>	

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		<p><i>detailed CTMP under Requirement 14, and which I note WLDC has been identified as a consultee.”</i></p> <p>Similarly, paragraph 3.6.36 of the ExA’s recommendation report into the West Burton Solar Project dated 8 August 2024 stated that:</p> <p><i>“The ExA is satisfied that, should more than one of the NSIP scale proposals progress concurrently, traffic movements during construction phases would be spread across the highway network. The proposed Joint CTMP would also give greater assurance that cumulative impacts would be managed.”</i></p> <p>The Secretary of State agreed with the ExA’s conclusions on cumulative effects in relation to the West Burton Solar Project in its decision letter issued on 24 January 2025.</p> <p>The ES has not been predicated on joint construction traffic measures. The assessment set out in Chapter 16: Transport and Access of the ES [APP-047] is based on the worst-case scenario, which assumes that the installation of the Cable Route Corridor is carried out independently of other DCO solar projects. However, the Applicant will continue to liaise with the other DCO solar projects to combine works and minimise cumulative effects where possible.</p>	
Q2.1.8	<p>Maintenance</p> <p>Table 2-2 of the Framework Operational Environmental Management Plan (FOEMP) [REP4-023] refers to the indicative design life of</p>	<p>The Applicant considers the assumption applied throughout the ES that one replacement would be necessary during the lifetime of the Scheme is appropriate, without accounting for technological improvements in panels (although those anticipated improvements do strengthen the position).</p>	<p>The Applicant’s response demonstrates the concerns that WLDC maintains with regard to the scope and impacts of replacing significant amounts of panels and associated infrastructure.</p>

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	<p>various scheme components. If the proposed development is anticipated to have an operational lifetime of 60 years and the lower end of the panel design life (as expressed in table 2-2) is 25 years then would there be a requirement (based on a reasonable worst case scenario) for at least two panel replacements over the lifetime of the project?</p> <p>If so, does the ES account for this, bearing in mind that many of the applicant's responses assume that there will likely only be one panel replacement over the lifetime of the development? If the applicant is asserting that likely technological improvements mean that panel life will increase – reducing the frequency of panel replacement – then can the applicant support this position with evidence?</p>	<p>Table 2-2 within the Framework OEMP [REP4-022] indicates that the current design life for panels range between 25-40 years, depending on the model of panel selected. All scenarios except for the lowest end of this range (i.e. the least durable panels currently on the market) would result in panels operating within their design life matching or exceeding the lifetime of the Scheme. The Applicant considers it reasonable to assume that the lowest end of this range will have improved by the point in time which any replacement of panels would be required, or that the operator would elect to install panel models of a greater durability to ensure only one replacement would be required in the remainder of the Scheme lifetime. For example, if panel models with a 25 year design life were replaced at exactly 25 years into the Scheme's operation, a single replacement with panel models of a 35 or greater year design life would last until the end of the Scheme's operational period.</p> <p>The Applicant also reiterates the comments made at ISH1 that "indicative design life" refers to the conservative assumptions applied by manufacturers as to the period of time within which technology will operate before declining in efficiency, or output beyond stated levels. Existing panel designs with a design life of 25 years will likely still be operational beyond 25 years. Even a short operational extension beyond their indicative design life would bring one replacement of panels within the lifetime of the Scheme.</p> <p>Finally, it is noted that Article 5(3) within the draft DCO [EN010142/APP/3.1(Rev06)] secures the assessment made in the Environmental Statement, prescribing "<i>This article</i></p>	<p>The lifespan of the panels, BESS and other infrastructure could be around 30% of the lifespan of the consent sought through the DCO.</p> <p>As drafted, Part 2. 5(3) of the dDCO allows the Applicant/developer to determine whether the impacts are 'materially different' from those reported in the ES. WLDC would have no input into that judgement.</p> <p>It is noted that that Applicant's clear position is that the whole scheme will in effect be replaced. This firstly means that the scope of this consent is effectively for the construction of more than one NSIP solar project (based upon an EIA with a baseline that was valid several decades before the replacement). Secondly, an amendment to Article 5(3) to restrict the replacement of panels only once would provide control and precision.</p> <p>WLDC maintains its objections on the likely cumulative impacts the scope of 'maintenance' provides all Applicant's/developers. The impacts of replacing whole project applies across all four of them, which will result in significant adverse impacts</p>

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		<p><i>does not authorise the carrying out of any works which are likely to give rise to any materially new or materially different effects that have not been assessed in the environmental statement.</i>” Two full replacements of the entirety of the Scheme’s panels would clearly generate materially different effects from that assessed in the environmental statement, particularly in respect of the greenhouse gas assessments which presume only one full replacement of the Scheme’s panels. This will restrict the operator from being able to replace the entirety of the Scheme’s panels more than once, preventing the concern raised by the Examining Authority from being able to occur.</p>	<p>that, at present, are not able to be controlled by WLDC at the date that they occur.</p>
Q2.1.18	<p>Degradation</p> <p>The Applicant provides estimates of solar panel degradation over time. Can the Applicant also provide an indication of battery degradation over time and the potential likelihood and frequency of battery replacement over the life of the project?</p>	<p>As detailed in REP3-010, paragraph 3.2.4, Table 3-1, the ES assesses that batteries have an indicative design life of 5–15 years, and assumes they will be replaced on average every 10 years over the operational life of the Scheme. Unlike solar panels, battery degradation is influenced by various factors, including technological advancements, operational conditions, and usage patterns. Battery technology is continuously improving, resulting in lower degradation rates and extended lifespans. A key factor affecting battery longevity is the number of charge-discharge cycles, which currently ranges between 5,000 and 15,000 cycles depending on the specific battery type and manufacturer. The ES assesses a reasonable worst-case scenario for degradation of batteries in terms of the frequency of replacement; however, a more precise degradation pattern can be determined at the detailed design stage</p>	<p>The frequency of degradation of infrastructure will result in frequent replacement throughout the lifespan of the Tillbridge project.</p> <p>Based on current drafting, the developer benefits from being able to carry out such works without any further approvals or requirement to demonstrate appropriate mitigation. The DCO effectively grants uncontrolled major development to occur, with judgement on the magnitude of the likely impacts being retained by the developer.</p> <p>As the three other NSIP solar energy generating station projects will require the replacement of their infrastructure at similar times, the</p>

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			<p>impact during construction cumulatively will be significant.</p> <p>As previously stated by WLDC, the cumulative waste that will be generated as a consequence of 'maintenance' will be significant, with currently no facilities within the UK able to process redundant materials.</p>
Q2.5.3	<p>Cumulative Construction Period</p> <p>The ExA has received representations with respect to the anticipated construction programme of the proposed project and the concurrent and cumulative construction programme of the other NSIPs in the area including the potential for combined working on the cable route corridor. Could the applicant produce a draft construction programme illustrating the likely construction period alongside that of other projects in the area should consent be obtained? This may be indicative or using best estimate of timelines where the full detail of other construction programmes is not known.</p>	<p>The Applicant notes that the anticipated construction programme of the Scheme and the other nearby solar NSIPs (Gate Burton Energy Park, Cottam Solar Project and West Burton Solar Project) are indicative and subject to change. However, the assessment of cumulative effects presented within Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev03)] has considered a worst-case scenario based on publicly available information relating to their construction, whereby in Scenario 1, the peak of construction activity overlaps across all of the cumulative schemes or whereby in Scenario 2, the construction of the cumulative schemes is completed sequentially over a 5-year period (refer to paragraph 18.4.28 of Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev03)]). These assessment scenarios are consistent with the methodologies of the other solar DCOs ESs.</p> <p>Table 2-1 of the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP3-031] presents the predicted construction start date, predicted end of construction dates and predicted connection date for each of the projects</p>	<p>The Applicant's response serves to demonstrate the issue raised by WLDC.</p> <p>Although the respective EIAs have been based upon certain scenarios, in practice the projects can (and most likely will) be delivered in a manner that could be staggered and over different periods that assumed.</p> <p>This has the potential to result in a longer cumulative construction period than assessed.</p> <p>It is notable from the Applicant's updated indicative construction period programme that the projects have already moved to later construction start and end dates. This demonstrates that there is no certainty on when construction</p>

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	<p>listed above, as they were known at Deadline 3 when it was submitted into examination. Construction periods have been calculated using these dates:</p> <ul style="list-style-type: none"> • Gate Burton Energy Park [EN010131] – 24-36 months; • Cottam Solar Project [EN010133] – 24 months; • West Burton Solar Project [EN010132] – 24 months; and • Tillbridge Solar Project [EN010142] – 24-36 months. <p>The Applicant has reviewed the NESO's TEC register dated 11 February 2025 (Ref 1-7). The register indicates the following connection dates for the cumulative solar NSIPs and the Scheme:</p> <ul style="list-style-type: none"> • Gate Burton Energy Park [EN010131] - 30/07/2030 (Q3 2030); • Cottam Solar Project [EN010133] - 01/09/2029 (Q3 2029); • West Burton Solar Project [EN010132] - 30/11/2028 (Q4 2028); • Tillbridge Solar Project [EN010142] - 27/08/2028 (Q3 2028). <p>Utilising the construction periods presented within Table 2.1 of the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP3-031] and the latest connection dates presented within the TEC register, as summarised above, Figure 1 below presents the indicative construction periods for each application. This is presented alongside the construction periods presented within Table 2.1 of the Joint Report on Interrelationships between Nationally Significant</p>	<p>activity will take place, which is acknowledged to have adverse impacts on the environment and communities. It is for this reason that WLDC has been disappointed that the applicants have not collaborated to provide a joint committed approach to construction that would be reflected in their respective management plans. WLDC has no doubt that the lack of binding co-ordination between projects will fail to mitigate these impacts as far as possible.</p>

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Infrastructure Projects [REP3-031] for comparison.

Figure 1 Indicative Construction Periods for the Tillbridge Solar Project and Nearby Solar NSIPs

Scheme	Year	2024				2025				2026				2027				2028				2029				2030			
		Quarter																											
Gate Burton Energy Park EN010131	Interrelationships Report [REP3-031] dates																												
	Revised dates based on TEC Register																												
Cottam Solar Project EN010133	Interrelationships Report [REP3-031] dates																												
	Revised dates based on TEC Register																												
West Burton Solar Project EN010132	Interrelationships Report [REP3-031] dates																												
	Revised dates based on TEC Register																												
Tillbridge Solar Project EN010142	Interrelationships Report [REP3-031] dates																												
	Revised dates based on TEC Register																												

Key:	Interrelationships Report [REP3-031] Construction Period	Revised Construction Period based on TEC Register
	Interrelationships Report [REP3-031] Connection Date	Revised Connection Date based on TEC Register

Note: The connection dates provided within Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP3-031] for Cottam Solar Project and West Burton Solar Project noted that there is potential for an earlier connection date to be achieved

On the basis of the construction periods presented within Figure 1 above, the cumulative construction period is either Q4 2024 to Q1 2028 on the basis of the dates currently included within Table 2.1 of the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP3-031] or Q3 2026 to Q2 2030 on the basis of the dates within the TEC register. The dates remain indicative and subject to change.

However, in either scenario, the assessment presented within Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev03)] remains valid, as it has considered a scenario where the peak construction of all of

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		the schemes overlaps and a total cumulative construction period of 5 years.	
Q2.9.3	<p>AGLV</p> <p>Could the applicant please respond to WLDCs assertion [REP4-053] that:</p> <p><i>‘WLDC consider that this unacceptable harm could be reduced significantly through a scheme design that recognised the sensitivity and importance of The Cliff, and avoided the imposition of infrastructure in the transitional area and the designated AGLV itself. Removing infrastructure from this eastern area of the scheme would serve to significantly minimise landscape character impacts whilst maintaining an NSIP scale energy generating station project and the benefits it would bring in terms of the generation of electricity from a renewable source.’?</i></p>	<p>The Applicant considers that the sensitivity and importance of the Cliff and AGLV have been incorporated into the design of the Scheme through early constraints and risk analysis, the subsequent preparation of more detailed Local Landscape Character Areas (LLCA) that capture the baseline variations and transitions along the Cliff at a greater detail and granularity than the West Lindsey Landscape Character Assessment; and design development that responds and reduces impacts particularly on the more sensitive landscapes. These include transitional areas around Harpswell that are not wholly within the AGLV. The Applicant maintains that the effects on LLCA that relate to the Cliff, as stated in Chapter 12: Landscape and Visual Amenity of the ES [REP4-013], are not significant at the operational Year 15 stage. Direct landscape impacts within the AGLV will only arise through works relating to an upgraded section of an existing farm track for construction access. The remainder of the Scheme along the Cliff scarp slope and the associated LLCA 2A Lincoln Cliff Open Farmland is proposed for biodiversity enhancement or will remain undeveloped as grassland within Sensitive Archaeological Sites. The removal of infrastructure from the eastern area along the Cliff would therefore be disproportionate and unnecessary, as it would not result in any reduction in significant landscape effects for such areas stated in Chapter 12: Landscape and Visual Amenity of the ES [REP4-013]</p>	<p>WLDC maintains its objections to the project due to its impacts on ‘The Cliff’ LCA and AGLV.</p> <p>WLDC understands the methodology applied and the conclusions reached in the ES. The objection raised by WLDC relates to the policy requirement to minimise harm on landscape character, and that ‘The Cliff’ is the key sensitive landscape characteristic in the area affected by the Tillbridge project and other NSIPs cumulatively. The issue raised by WLDC was to suggest that Applicant could readily reduce these impacts by removing components of the scheme in the eastern sections. The Applicant’s response to this seems to suggest that that sensitivity or policy requirement to minimise impacts is ‘disproportionate and ‘unnecessary’ a conclusion which WLDC disagrees.</p>
Q2.9.4	Cumulative Landscape Character effects	Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev03)] acknowledges that a significant cumulative landscape effect will arise on LLCA 3A	WLDC maintains disagreement with the applicant that sequential views cannot ‘realistically be determined’. It

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	<p>WLDC's Summary of representations made during ISH3 [REP4-053] states in part:</p> <p>'In determining the application, WLDC encourages the impacts of not just the conclusions reached in the ES to be taken into account. The cumulative landscape character impacts must be considered as a kinetic and sequential basis, with an appreciation of the scale of the change across the district. This requires a careful awareness of how the projects link together to create the significant adverse impacts. Despite the discussion regarding the 'sequential' experience, WLDC notes that this matter is not addressed or considered explicitly in the ES (chapter 12 only refers to 'sequential' in response to consultation representations).' Could the applicant please provide a response?</p>	<p>Till Vale at the construction, operation (Year 1) and operation (Year 15) stages. This predominantly reflects the combination of the Scheme and the Cottam Solar Project extending the presence and influence of solar infrastructure at Year 15 along an approximately 15 km north-south corridor within the LLCA and areas with corresponding character. The Applicant considers that these reflect the scale of change at a district level. The Applicant has identified representative viewpoints for which significant cumulative visual effects will arise, and where these may reflect sequential views, in Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev03)]. Further to this, the Applicant provided a summary on pages 15 and 16 of the Written Summary of Applicant's Oral Submissions at the ISH3 [REP4-049] of likely sequential cumulative views in relation to other DCO schemes, with reference to the layout, relationship, likelihood of journeys and receptor sensitivity based on professional judgment.</p> <p>The Applicant acknowledges that sequential views of the solar DCO schemes will be available, but that a quantitative evaluation of such views across the District and where quantitative evidence of journey scenarios cannot realistically be determined. Thus potential effects from sequential views can only be made through professional judgement; and furthermore such an exercise would need to be proportionate</p>	<p>could readily have been done so, however the Applicant's justification for not doing so seems to be that it would require 'professional judgement' and it seems that such an exercise would be disproportionate.</p> <p>It is clear that such an assessment could have been carried out to provide a clear illustrations of cumulative impacts throughout the landscape. The Applicant has simply decided not to do so.</p>
Q2.9.5	<p>WLDC's Summary of representations made during ISH3 [REP4-053] states in part:</p>	<p>The Applicant refers to the response provided in Q2.9.4 above. The locations described by WLDC are considered by the Applicant to equate to the area within which significant cumulative landscape effects are reported in Chapter 18:</p>	<p>The Applicant continues to view this issue as a rigid LVIA assessment of fixed viewpoints. Whilst this follows methodology, WLDCs concern is that there is no evidence before the</p>

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	<p>'To ensure that a thorough understanding of the large scale cumulative visual effects are applied to policy, WLDC consider that an assessment based upon travelling through the landscape must be carried out. To understand the impacts, consideration of how they will be experienced from traveling north at Blyton through the projects to Saxilby in the south, and Marton in the west to The Cliff in the east is required. It must also be acknowledged that the solar generating station projects will be experienced at points along all major highways in the district alongside minor roads that pass nearby/through them. There will be limited relief from experiencing the visual impacts of the projects cumulative across the West Lindsey District, which WLDC contends is an exceptional circumstance that is not foreseen as an inherent impact in NPS policy.'</p> <p>Could the applicant please provide a response?</p>	<p>Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev03)].</p> <p>Whilst the Applicant accepts that sequential views will be available, it does not consider that there will 'limited relief' from visual impacts, particularly at Year 15 when mitigation planting will be established. Broadly, receptors on 'major highways' are considered to be of lower sensitivity, for which the most extensive section where views will be experienced is the A631 and where significant visual effects in relation to the Scheme have been reported for the construction and operational Year 1 phases in Chapter 12: Landscape and Visual Amenity of the ES [REP4-013]. Aside from the A631, the only other 'major highway' adjacent to the solar DCO schemes is the A1500, where views of the West Burton Solar Project will be expected, but these two routes are an approximately 15 to 20-minute driving time apart. The Applicant has identified significant cumulative visual effects for representative viewpoints along the intervening Middle Street, but these are considered to be limited in number and reduced by Year 15. The alternative north-south oriented B1241 is adjacent to the Cottam Solar Project at Normanby by Stow, but only for an approximately 270 m section, where there is an existing hedgerow. The Applicant also acknowledges that views will be available for rural routes that attract more recreational receptors, but the largely east-west orientation of these is such that travel times between views will be longer. This is reflected in the summary provided in the post-hearing note on pages 15 and 16 of the Written Summary of Applicant's Oral Submissions at the ISH3 [REP4-049]. The Applicant's Planning Statement [REP3-027] sets out how the Scheme is in accordance with the relevant national policy statements and important and relevant matters, and from this considers the Scheme</p>	<p>decision maker to set out the cumulative impacts as one experiences the wider landscape. This issue represents the critical issue for the determination of this application, as its acceptability and compliance with policy must be made on its cumulative impact with the other three solar NSIP projects.</p> <p>WLDC maintains its position that the cumulative impacts that derive from all four NSIP solar projects are what render this decision unique and an 'exceptional circumstance' for the purpose of decision making.</p>

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		<p>n the overall planning balance. The Applicant's Comments on Interested Parties Submissions for First Written Questions at Deadline 3 [REP4-048] sets out how the residual significant effects of the Scheme in relation to landscape and visual matters need to be balanced against the urgent need for the Scheme, which must be given substantial weight in the planning balance with this outweighing the localised landscape and visual effects. The Applicant's view is that the adverse landscape and visual effects are outweighed, including when considered cumulatively with other developments, and that there is not necessarily a need to apply the CNP presumption under NPS EN-1 as a result. The Applicant's Comments on Interested Parties Submissions to the First Written Questions at Deadline 3 [REP4- 048] (pages 4 to14) also responds in detail on this point. The Applicant confirms that the landscape and visual effects are outweighed by the Scheme's substantial benefits, including when considering cumulative impacts. This position is then further strengthened when the presumption under NPS EN-1 paragraphs 4.1.7/4.2.15 is applied, with the Scheme being CNP infrastructure and as such outweighing any residual effects "in all but the most exceptional cases". The residual harm associated with the Scheme is far from the types of effects that may be in the realm of exceptional circumstances, let alone "the most" exceptional circumstances (examples of which are provided in EN-1), such that the starting point of the Scheme's benefits outweighing any residual effects is not displaced</p>	
Q2.9.6	Residential Amenity	<p>An assessment of impacts on the amenity of residential properties, local businesses, and users of open space has been provided within Chapter 14: Socio-economics and</p>	<p>The Applicant again appears to justify not carrying out a rounded assessment on the acceptability of</p>

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	<p>WLDC's Summary of representations made during ISH3 [REP4-053] states in part: 'WLDC's position is that there is no assessment within the application documents of the impact of the project (individually and cumulative) in terms of impacts upon residential amenity. WLDC would expect to see a separate assessment where, typically, an LVIA professional and a planning professional would carry out a joint assessment to provide an assessment against policy. Other impacts such as noise, vibration, traffic and glint and glare would also be included to provide a rounded judgement of acceptability. During the hearing there was a discussion around the necessity of a Residential Impact Assessment. The applicant contended that one was not required with the ES providing the impacts required to inform a robust decision. WLDC note, however, that the Gate Burton Energy Park NSIP application did carry out a Residential Visual Amenity Survey, which was helpful in providing an assessment on a 'property-by-</p>	<p>Land Use of the ES [APP-045]. This assessment reviews the potential for noise, air quality, visual and traffic effects arising from the Scheme, prior to determining the impact on the amenity of residents, businesses, and users of open spaces within the study area. An assessment against policy is provided within the Planning Statement (refer to Section 6.14) [REP3- 027]. No significant adverse effects with regards to residential amenity have been identified.</p> <p>The Applicant maintains that the assessment of visual effects and the use of representative viewpoints in Chapter 12: Landscape and Visual Amenity of the ES [REP4-013] is robust and proportionate in relation to the consideration of views from properties. The Applicant refers to the Statement of Common Ground [EN010142/APP/9.9(Rev02)] where LCC state they are comfortable with the absence of a Residential Visual Amenity Assessment (RVAA).</p> <p>The Applicant's justification for the absence of an RVAA is provided in Chapter 12: Landscape and Visual of the ES [REP4-013] and is referenced in the Written Summary of the Applicant's Oral Submission at ISH3 [REP4-049] at Agenda Item 3b on page 9 and 10. The Applicant is aware that a Residential Visual Amenity Survey was undertaken for the Gate Burton Energy Park [Gate Burton document reference APP-150]. This document concluded that no significant effects were found on residential receptors, the RVAA threshold was not reached and thus a full RVAA was not carried out. Given the characteristics of the Gate Burton Energy Park and residential properties surveyed, along with distance to infrastructure elements, are broadly similar to those associated with the Scheme; the Applicant considers that the findings would be broadly consistent were an equivalent survey to have been undertaken in respect of the Scheme.</p>	<p>the project on residential amenity terms on the basis that it is not required.</p> <p>WLDCs view was that such an exercise is required to fully understand impacts, especially cumulatively with the other solar NSIPs.</p> <p>A robust residential amenity assessment would bring together all impacts to form a planning judgement. Just because a specific impact is judged to not be 'significant' in EIA terms, this does not eliminate that impact from being relevant or negative in terms of a planning balance.</p> <p>The Applicant relies upon the Planning Statement, however this document simply re-iterates the conclusions reached in the ES. It does not provide an planning assessment that takes those impacts and considers them against policy as a planning judgement.</p> <p>WLDC remains disappointed that a cohesive assessment of the impacts on residential amenity has not been carried out. This matter has been left</p>

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	<p>property' basis and applying impacts to established 'tests' of acceptability. WLDC also noted the discussion regarding the impact upon what is understood to be 'financially involved' properties. Regardless of whether a current property owner is to benefit from the scheme or not, the assessment of impacts upon properties remain the same and residential amenity should be considered equally in the public interest.'</p> <p>Please could the applicant provide a response?</p>	<p>The Applicant reiterates that the Landscape Institute Technical Guidance Note (TGN) 2/19 (Ref 1-15)RVAA provides examples of factors which might contribute to the threshold being reached, including 'unavoidable', 'overwhelming', 'oppressive' and 'overly intrusive'. Based on the informed professional judgement that TGN 2/19 states is required to determine such conclusions, the Applicant does not consider that such descriptors and thus the threshold has been reached for any residential properties.</p> <p>Furthermore, the Applicant considers that for properties that are adjacent or close to the Order limits, the combination of their baseline characteristics including orientation and screening, combined with the Scheme design and proposed mitigation, are such that a development of a relatively low profile and where the marginally taller BESS - Solar Station Compounds are located at a minimum of 250m distance, visual effects will be more limited.</p> <p>The Applicant has considered potential visual effects and applied appropriate mitigation for all properties equitably, regardless of financial interest.</p>	<p>to the decision maker to carry-out this exercise in the absence of an assessment.</p>
Q2.10.2	<p>Requirement 17</p> <p>In its written summary of oral submissions at ISH3 [REP4-049] the applicant states in part:</p> <p>'Dr Muirhead, for the applicant responded to questions of clarification from the ExA, WLDC and LCC as to whether</p>	<p>Requirement 17 concerns the operational noise of the as-built scheme following detailed design. It commits to these levels at noise sensitive receptors being no higher than reported in the ES. Noise monitoring at source is not a relevant part of this requirement since it must be met prior to commencement of the construction of the Scheme.</p> <p>Additionally, in the final design, operational plant may have moved in terms of its physical location when compared to the indicative masterplan, meaning that noise levels at</p>	<p>Following discussions with the Applicant, it has been clarified to WLDC that noise complaints during the operational phase of the project is would be enforced through the OEMP.</p> <p>This approach therefore places a significant responsibility on the detail</p>

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	<p>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.</p>	<p>sensitive receptors would need to be calculated from the sound power levels of the plant and the associated distances from receivers.</p> <p>Once the plant is installed, noise monitoring at source becomes a relevant control measure, as, without any changes between the source and receiver, changes in the noise at source can be considered to correlate with changes in noise at sensitive receptors. The requirement for controlling noise monitoring at source is embedded within Table 3-8 of the Framework OEMP [REP4-022], which is secured through Requirement 13 of the draft DCO [EN010142/APP/3.1(Rev06)]. 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.</p>	<p>and clarity in the OEMP to be sufficient to ensure that noise issues can be resolved quickly in the interests of residential amenity (including where properties receive noise from more than one solar farm).</p> <p>WLDC understands the logical approach adopted by the Applicant in seeking to control noise at source, however this represents the remedy. It does not in itself confirm whether the noise levels being experienced at properties are acceptable.</p> <p>WLDC also notes that 'Requirement' 13 is a 'single approval' document prior to the commissioning of the authorised development. In practice this therefore requires mitigation to be 'approved' prior to the scheme is operation and the sound/noise levels are experienced. With no mechanism to review and adapt the OEMP throughout the operational lifespan of the project, WLDC remains concerned that there is no ability to remedy unacceptable noise impacts should they arise post approval of the OEMP.</p> <p>Following discussion with the Applicant, the FOEMP has been</p>

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			<p>updated to require liaison with WLDC in the event of a noise complaint, which includes the agreement of noise monitoring to be undertaken. This includes the identification of locations.</p> <p>This amendment is supported by WLDC and provides a mechanism to overcome the issues raised and be able to address complaints with the involvement of WLDC.</p>
Q2.10.3	<p>Requirement 17 In its written summary of oral submissions at ISH3 [REP4-049] the applicant states in part:</p> <p><i>'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</i></p>	<p>As stated above, in response to Q2.10.2, Requirement 17 must be met prior to the construction of the Scheme, therefore routine maintenance, including the monitoring of plant at source, cannot be incorporated into this condition as such plant would not be operational on site at the time of the assessment. The relevant Requirement which secures the Framework OEMP [REP4-022], and ensures any detailed OEMP must be finalised and applied in general accordance with the Framework OEMP [REP4-022] is Requirement 13 of the draft DCO [EN010142/APP/3.1(Rev06)]. On this basis, the Applicant does not consider it necessary to amend Requirement 17, as the point highlighted is already secured. The Applicant considers there is value in both ensuring detailed design and plant selection is required to be designed to specific sound levels (as per Requirement 17) and that these are validated throughout the life of the Scheme through regular monitoring (as per the Framework OEMP [REP4-022], secured by Requirement 13). This approach ensures that reliance is not placed either just on modelling utilised at detailed design / plant selection, nor on monitoring during the life of the Scheme</p>	<p>As stated above, the Applicant has amended the fOEMP to require liaison with WLDC to agree the approach to monitoring in the event of a noise complaint.</p> <p>This updated position is reflected in the SoCG.</p>

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	<p><i>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.'</i></p> <p>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 accurate and effective, respectively?</p>	

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Q2.10.4	<p>Construction noise</p> <p>WLDCs summary of oral submissions at ISH3 [REP3-067] states in part:</p> <p><i>‘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.’</i></p> <p>Could the applicant provide a response and indicate how this matter could be addressed</p>	<p>While WLDC’s submission does not distinguish between operational and construction noise in its discussion of cumulative noise impacts and their management, the Applicant considers it is important to respond on these impacts separately, given the nature of noise is different at construction and operation, and given there are discrete DCO requirements which address these separately. WLDC’s submission appears to have applied the requirements which relate to operational noise as if they apply to construction noise management as well and does not appear to have had regard to the separate construction noise mitigation and management approach presented in the application.</p> <p>Construction noise</p> <p>The Framework CEMP [EN010142/APP/7.8(Rev03)], as secured by Requirement 13 of the draft DCO [EN010142/APP/3.1(Rev06)] is the mechanism securing construction noise mitigation. This 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 1-16) 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. Table 3-8 of the Framework CEMP [EN010142/APP/7.8(Rev03)] requires that “Regular liaison meetings will be held with other high-risk construction sites within 500m of the Scheme (or greater, if applicable), to ensure plans are co-ordinated and noise and vibration is</p>	<p>WLDCs concern on this matter related to both construction and operational phases (i.e. any phase of the project that may give rise to complaints from people regarding noise).</p> <p>WLDCs consistent request has been for the Applicant to set out a clear mechanism that, in the event of a complaint from a person, enables an efficient and swift investigation and resolution. This also includes how a cumulative scenario, where a property is affected by two or more solar farm projects, will be resolved.</p> <p>As stated above, the Applicant has amended the fOEMP to require liaison with WLDC to agree the approach to monitoring in the event of a noise complaint.</p> <p>The now agreed approach relates to the Scheme in solus. There remains no agreed approach between</p>

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	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?	<p>minimised. It is important to understand the interactions of the off-site transport / deliveries which might be using the same routes." Table 3-8 also states that "Noise complaints will be monitored and reported to the Applicant for immediate investigation and action. A display board will be installed on-site, and a website will be set up. These will include contact details for the Community Liaison Officer or alternative with whom nuisance or complaints can be lodged. A logbook of complaints will be prepared and managed by the Site Manager." These provisions ensure that the Applicant manages, and immediately investigates any complaints made in respect of construction noise. Consents sought under the Control of Pollution Act would ensure noise limits are set for any particularly noisy works.</p> <p>Operational noise By comparison, any cumulative operational noise between the four solar schemes is much less likely. As outlined in paragraphs 18.14.13 and 18.14.14 of Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev03)], this is due to the significant distances between each of the four operational solar areas (and associated noise generating infrastructure such as Solar Stations or substations). The primary area of overlap between the projects, being the combined cable route, will be underground and therefore generate no noise. The cumulative effects assessment found there would be only one receptor with a possibility of cumulative noise with another of the solar schemes, being R14 (Glentworth Grange / Kexby Road). However, the assessment found that any increase would be less than 3dB and therefore imperceptible to human receptors. With the context of any operational cumulative noise effects being unlikely, the nature of the complaint, including the location, distance to solar infrastructure, and perceived direction of the sound</p>	projects to work collaboratively in the event of a noise complaint.

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	<p>should clearly identify the scheme to which the complaint relates. The suggestion to include measures which require operational plant to shut down in order to assess noise is therefore unnecessary, and would disproportionately impact the operation of the Scheme for no benefit. Despite this, the Applicant has proposed mitigation measures so as to ensure any operational noise is appropriately managed. The provisions contained within Table 3-8 of the Framework OEMP [REP4-022], such as the reporting of monitored plant noise to the relevant planning authority, will then help identify whether there is an issue to be addressed in terms of the Scheme infrastructure. Where this review indicates plant noise levels generated by the Scheme have materially increased, the undertaker and relevant planning authority will liaise in respect of any further maintenance or mitigation required to reduce levels at receptors back to those presented in the ES. Requirement 17 of the draft DCO [EN010142/APP/3.1(Rev06)] is not merely concerned with mitigation but also necessitates that the Scheme's components are designed and selected so that noise levels at residential properties are no higher than those reported in the ES, effectively ensuring specific noise limits at local properties are not significant. Finally, in respect of the comment about Article 7 of the draft DCO [EN010142/APP/3.1(Rev06)], it is correct that this alters the application of the Environmental Protection Act (Ref 1-17) where orders cannot be made if the nuisance relates to one of the listed scenarios in that article. This is a standard, model provision to manage overlap between regimes. In line with Regulation 5(2)(f) of the APFP Regulations (Ref 1-18), the Applicant submitted the Statutory Nuisance Statement [APP-218] which confirmed the threshold for statutory nuisances would not be met by any effects of the Scheme (including noise).</p>	

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Q2.13.4	<p>FCTMP</p> <p>Please could the applicant provide a response to WLDCs response to Q1.13.12 [REP3-066]?</p>	<p>The Applicant has responded to this within the Applicant's Comments on Interested Parties Submissions to the First Written Questions at Deadline 3 [REP4-048]. The response is provided below for ease of reference.</p> <p>"Primarily, the Applicant considers it would be inappropriate to implement a requirement in the <i>draft DCO</i> [EN010142/APP/3.1(Rev05)] for a joint CTMP, because:</p> <ul style="list-style-type: none"> · Section 120 of the Planning Act (Ref 1-12) provides that a DCO may impose requirements in connection with the development for which consent is granted. Such requirements may correspond with conditions which could have been imposed on the grant of planning permission under the Town and Country Planning Act 1990 (Ref 1-13). In this regard, the relevant paragraphs of the National Planning Policy Framework (Ref 1-4) and associated Planning Practice Guidance (Ref 1-5) concerning conditions generally apply. Requirements should therefore be precise, enforceable, necessary, relevant to the development, relevant to planning and reasonable in all other respects. · The Applicant does not consider a requirement which enforces a Joint Cooperation agreement or Joint Management Plans would meet these standards, as no single party has authority over another and each DCO only controls the activities for that project. While Tillbridge Solar can endeavour to align management of works with the other developers, it cannot compel them to do so, and it cannot utilise the powers within their draft DCO unless specifically 	<p>WLDC maintains its previous position on this matter.</p> <p>It is noted from the Applicant's response that the language in the fCTMP remains non-committal and general in its terminology.</p> <p>WLDC also understands the scope of the Planning Act 2008 with regard to the imposition of 'Requirements' in DCOs.</p> <p>As previously stated by WLDC, all of the Applicants could have entered into a binding legal agreement to deliver a committed approach to joint working.</p> <p>The Joint Report on Interrelationships between the NSIPs remains a document that is not secured through the dDCO and therefore has no binding effect in terms of minimising impacts.</p>

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	<p>provided for by those undertakers. Any such requirement would therefore reach beyond the extent of the works within this Scheme being authorised, and as such would not be enforceable.</p> <p>Notwithstanding this, the Applicant has included several mechanisms and measures for cumulative effects to be managed by the undertaker and directly by local authorities:</p> <ul style="list-style-type: none"> · Local highways authorities are able to manage cumulative effects through their permitting schemes for street works and traffic management, which the Applicant has included new drafting in its DCO to clarify. A primary purpose of these schemes is for highways authorities to be able to sequence trafficworks within their broader area. · More broadly, the <i>Framework CTMP [EN010142/APP/7.11(Rev04)]</i> includes consideration and management for cumulative effects, For example sections 7.1, 7.2 and 8.5 include specific provisions to require engagement with local authorities in respect of the timing of works and their sequencing between projects. The relevant planning authorities generally are required to review and approve the final plans prior to construction commencing, and in doing so could require the Applicant and other solar developers to better manage cumulative effects if they do not consider the existing plans appropriately address these. · Related to the above, the Applicant responded to comments made within WLDC's LIR on the <i>Framework CTMP [EN010142/APP/7.11(Rev04)]</i> and its management of cumulative effects at paragraph 9.34 within <i>Applicant's Response to the Local Impact Report [REP3-061]</i>. This confirmed, as demonstrated within <i>Chapter 18: Cumulative Effects and Interactions</i> of the 	

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	<p>ES[EN010142/APP/6.1(Rev02)], there would not be a significant adverse cumulative impact in transport terms, in the extremely unlikely event that the peaks of the four cumulative projects occur at the same time. Thus, there are no significant impacts requiring additional measures beyond what is already set out in the ES and existing <i>Framework CTMP</i> [EN010142/APP/7.11(Rev04)] to control cumulative impacts, and the Applicant does not agree that additional controls are required to align the projects and their management of construction traffic.</p> <p>· If granted, the final Scheme must be constructed in accordance with the effects assessed for the Application. If it is considered that the effects are worse than those assessed, the Scheme will be required to ensure these are managed such that they are brought in line with the assessment, including in respect of cumulative impacts. The Applicant would need to confirm effects are no worse than those assessed in the Environmental Statement as part of the process for discharge of any requirements, pursuant to Schedule 17 of the draft DCO [EN010142/APP/3.1(Rev05)].</p> <p>“Notwithstanding this, as set out in the Statement of Common Ground with Other Solar Developers [REP1-037], the four solar projects are currently in discussions regarding a further cooperation agreement. While the scope and content of this further agreement are still under discussion, it will likely relate to (amongst other things) how the four projects will work together in the discharge of their respective DCO requirements. This could include, for example, the preparation and approval of a Joint CTMP – if all parties elect to do so and this is compatible with detailed design. The Framework CTMP [EN010142/APP/7.11(Rev04)] specifically refers to the</p>	

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		proposal to prepare a Joint CTMP between the four projects (see paragraph 1.3.4).	
Q2.15.3	<p>Minerals and Waste</p> <p>Could the applicant please provide a response to WLDC's response to Q1.15.6 [REP3-066]?</p>	<p>The Applicant provided a response to WLDC's response to Q1.15.6 on page 33 of the Applicant's Comments on Interested Parties' Submissions to First Written Questions at Deadline 3 submitted at Deadline 4 [REP4-048]. This is provided below for ease of reference.</p> <p>"The control mechanisms for the replacement of various solar infrastructure components during the operational phase of the Scheme are explained within Section 2.3 of the <i>Framework OEMP [EN010142/APP/7.9(Rev03)]</i>. Furthermore, as set out within <i>Table 3-16 of the Framework OEMP [EN010142/APP/7.9(Rev03)]</i>, the waste hierarchy will be applied during the replacement of any infrastructure. <i>Table 3-16 of the Framework OEMP [EN010142/APP/7.9(Rev03)]</i> commits to 70% diversion of waste from landfill. Waste management will be kept under review throughout operation and decommissioning. This will be documented as periodic reviews of the detailed OEMP through operation, as set out within Section 2.7 and Table 3-16 of the Framework OEMP [EN010142/APP/7.9(Rev03)], and before decommissioning commences in the Decommissioning Resource Management Plan (DRMP), as set out within Section 2.10 and Table 3-15 of the Framework OEMP [REP3-037].</p> <p>Further clarification on the waste cumulative impact assessment was provided within Appendix A to the Applicant's Response to Relevant Representations [REP1-028], which included the consideration of a scenario where no waste management infrastructure is available. Although,</p>	<p>As 'Requirement 13' only requires the OEMP to be approved prior to commissioning, with no further monitoring or reviews, the approach to minimising impacts from waste incurred through the replacement of significant amounts of the project is only determined at that stage.</p> <p>There are no mechanisms in the OEMP to provide the right controls to minimise these impacts at the time they occur throughout the 60 year lifespan of the project.</p> <p>WLDC maintains its concern that significant impacts (including cumulative) could occur as a consequence of the replacement of much of the project of its lifespan, but that the mitigation is only determined at a point in time before the scheme is operational. It does not allow for consideration of any changes in the environment that may occur between pre-commissioning and the actual time at which the works will be carried out within the 60 year period.</p>

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		<p>the Applicant notes that the scenario of no waste management facilities being available across the whole of England and East Midlands for recycling waste streams from the Scheme is unrealistic and considers the 70% recovery from landfill being the realistic worst-case scenario.</p> <p>The study area for non-hazardous waste management is the East Midlands, the study area for hazardous waste management is England. Further information is provided in the Applicant's Response to Relevant Representations [REP1-028] (in response to the Environment Agency on pages 43-44) and within Appendix A of the Applicant's Response to Relevant Representations [REP1-028]."</p>	
Q2.15.4	<p>PoC</p> <p>Could the applicant please provide a response to WLDC's response to Q1.15.9 {REP3-066}?</p>	<p>The Applicant provided a response to WLDC's response to Q1.15.9 on page 33 and 34 of the Applicant's Comments on Interested Parties' Submissions to First Written Questions at Deadline 3 submitted at Deadline 4 [REP4-048]. This is provided below for ease of reference.</p> <p>"As set out in paragraph 3.1.4 to 3.1.7 of the <i>Applicant's Grid Connection Statement [APP-214]</i>, NGET has confirmed that an existing spare bay within the National Grid Cottam Substation is currently available. Works will be required as part of the Scheme to facilitate connection to the National Grid Cottam Substation and will be undertaken by the Applicant and National Grid. These works would mainly comprise electrical works to provide connection and protection of electrical infrastructure. National Grid will provide a skeleton bay at the National Grid Cottam Substation and will carry out the substation control modification work and bus bar protection required to enable the Applicant to connect.</p>	<p>WLDC notes the Applicant's response and has nothing further to add.</p>

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	<p>The Applicant will carry out all works required to take the Scheme up to the bay at the National Grid Cottam Substation. This includes work to construct the section of the Cable Route Corridor within the National Grid Cottam Substation site, works to build, equip and commission the bay at the National Grid Cottam Substation, and the installation of a system to monitor the power exported to the transmission system. The works required to facilitate connection undertaken by the Applicant would be under the</p> <p>Applicant's control and works undertaken by National Grid would be under National Grid's control. The Environmental Statement carried out by the Applicant has considered all of the above works within its assessment of effects. Schedule 1, Work No. 5 of the <i>draft DCO [EN010142/APP/3.1(Rev05)]</i> also authorises these works."</p>	