Tillbridge Solar

Tillbridge Solar Project

EN010142

Applicant's Response to Examining Authority's Third Written Questions

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0. Introduction

0.1.1 This report responds to the Examining Authority's (ExA) third written questions, issued on 04 February 2025 **[PD-011]**. This report responds to each of the questions posed to the Applicant, and where the Applicant considered it could provide assistance to the ExA, it has also responded to some questions addressed to other parties.

0.1.2 The following sections of this report are tabularised to include the ExA's questions and a response to each question as follows:

- General and cross topic questions (17);
- Biodiversity and ecology (2);
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- Compulsory acquisition, temporary possessions and other land or rights possession (2);
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- Noise and vibration (5);
- Socio-economic effects (7);
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- Transport and access (8);
- Water environment including flood risk (1); and
- Other planning matters (5).

1. General and cross-topic questions

Table 1-1: General and cross-topic questions

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.1.1	Applicant, LCC, WLDC and 7000 Acres	**Planning Balance in SoCGs** Could the applicant and the respective parties to Statements of Common Ground (SoCG) please include a clear section on the planning balance to be applied in the determination of this application? In particular, the ExA would like these parties to please confirm their positions (and points of difference) on the weight to be afforded to the adverse effects and the benefits of the proposal. For example, the ExA understands that WLDC does not criticise the conclusions reached on adverse effects in the applicant's ES. Where it differs is on the weight to be afforded to these adverse effects in the overall planning balance. As such, it is essential that the difference between the applicant and WLDC is established on a topic-by-topic basis in the SoCG. The same exercise should be undertaken in respect of SoCGs with LCC and 7000 Acres.	The position of each party (WLDC, LCC and 7000 Acres, and the Applicant) in relation to the planning balance to be applied in the determination of this Application is set out in each parties SoCG, as follows: • Row 3.9 of **Statement of Common Ground with West Lindsey District Council [EN010142/APP/9.8(Rev04)]** • Row 3.5 of **Statement of Common Ground with Lincolnshire County Council [EN010142/APP/9.9(Rev03)]** • Row 1.54 of **Statement of Common Ground with 7000 Acres [EN010142/APP/9.37(Rev01)]**
Q3.1.2	All parties	**SoCG** Please ensure that all final SoCGs are signed by the parties to them. Please also ensure that they clearly express any matters not agreed (i.e. outstanding matters in dispute) between parties to each SoCG.	The **Statement of Commonality [EN010142/APP/9.4(Rev05)]** sets out the final position of SoCGs and shows that all but three of the SoCGs prepared as part of the Application have been signed and set out the final position of each party. These include the following SoCG's: • **Statement of Common Ground with Canal and River Trust [REP4-042]** • **Statement of Common Ground with National Highways [REP1-038]** • **Statement of Common Ground with Historic England [REP4-057]** • **Statement of Common Ground with Scunthorpe and Gainsborough Water Management Board [REP1-044]** • **Statement of Common Ground with Upper Witham Internal Drainage Board [REP1-041]** • **Statement of Common Ground with Lincolnshire Wildlife Trust [REP1-045]** • **Statement of Common Ground with Bassetlaw District Council [REP3-053]** • **Statement of Common Ground with Nottinghamshire County Council [REP5-031]** • **Statement of Common Ground with Natural England [EN010142/APP/9.18(Rev02)]** • **Statement of Common Ground with Environment Agency [EN010142/APP/9.16(Rev03)]** • **Statement of Common Ground with Anglian Water [EN010142/APP/9.15(Rev01)]** • **Statement of Common Ground with Trent Valley Internal Drainage Board [EN010142/APP/9.14(Rev01]** • **Statement of Common Ground with West Lindsey District Council [EN010142/APP/9.8(Rev04)]**

ExQ3	Questions to:	Question:	Applicant's Response:
			• **Statement of Common Ground with Lincolnshire County Council [EN010142/APP/9.9(Rev03)]** • **Statement of Common Ground with Other Solar Developers [EN010142/APP/9.21(Rev01)]** Therefore, the majority of SoCG's have been signed by the parties, and clearly express the final position, including any matters not agreed between parties in each SoCG, before the end of the Examination. The only SoCGs that have not been signed are as follows. Although these SoCG have not been signed by the other parties, they still show the final position of each party at the end of the Examination: • **Statement of Common Ground with Network Rail [EN010142/APP/9.25(Rev01)]** • **Statement of Common Ground with 7000 Acres [EN010142/APP/9.37(Rev01)].**

2. Biodiversity and ecology

Table 2-1: Biodiversity and Ecology

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.2.1	Applicant, EA	**Riparian Mammals** Please can the applicant update Construction Environmental Management Plan with reference to the comments raised by the Environment Agency in the response at DL5 (REP5-052). Please can the Environment Agency comment upon the suitability of the existing provisions in the Construction Environmental Management Plan and any possible changes proposed by the applicant for all riparian mammals.	The Applicant noted the comment raised by the Environment Agency and included additional measures in relation to surveying of riverbanks for Water Vole during the construction period within **Table 3-4** of the **Framework CEMP [REP5-015]**, which was submitted into examination at Deadline 5. The Applicant shared and agreed the additional measures with the Environment Agency in advance of their submission into examination, as presented within the **Statement of Common Ground with the Environment Agency [EN010142/APP/9.16(Rev03)]**.
Q3.2.2	Applicant, EA	**EMF effects on migratory fish** With regards to the issue raised by the Environment Agency (REP3-068) at DL3 and subsequently discussed at ISH3. Please can the Environment Agency and the applicant comment on the adequacy of the proposed monitoring regime; and the potential manners in which the risks could be mitigated if the monitoring establishes an impact is taking place?	The Applicant responded to the EA at Deadline 4 within the **Applicant's Comments on Interested Parties Submissions to the First Written Questions at Deadline 3 [REP4-048]**. This states: *"As set out within **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]** and **Appendix 9-12: Habitat Regulations Assessment Report** of the ES **[REP3-006]**, no likely significant effects from EMF on fish within the River Trent have been identified. Notwithstanding this, as recorded in the **Statement of Common Ground with the Environment Agency [REP3-055]**, the Applicant has agreed that they will contribute to the monitoring of EMF within the River Trent, as agreed with the other solar developers, with the detail to be agreed in due course. The EA accept that these discussions may take longer than it takes to determine the DCO application. The requirement for the Applicant to contribute to this programme of monitoring is set out in **Table 3-4** of the **Framework OEMP [EN010142/APP/7.9(Rev03)]**."* **Table 3-4** of the **Framework OEMP** [**EN010142/APP/7.9(Rev04)]** sets out the principles for the monitoring, but as recorded within the **SoCG with the Environment Agency [EN010142/APP/9.16(Rev03)]** the discussions as to exactly what this monitoring programme will consist of will continue beyond the determining of the DCO application. This could include any response to the outcomes of monitoring, if

ExQ3	Questions to:	Question:	Applicant's Response:
			deemed necessary. However, the firm commitment for a monitoring regime or contribution to monitoring regime is secured in the **Framework OEMP [EN010142/APP/7.9(Rev04)]**. The Applicant would like to note that irrespective of the commitment to provide monitoring, the conclusions of the **Habitats Regulations Assessment [REP3-007]** remain that there will be no likely significant effect to migratory fish from EMF. Natural England concur with this position in the **SoCG with Natural England [EN010142/APP/9.18(Rev02)]**.
Q3.2.3	Applicant, WLDC, LCC	**Bat roosting, foraging and commuter sites** Further to the discussions at ISH3 with regards to the potential for bat roosting sites within and outside of the order limits, please can the applicant comment on the concerns raised regarding the potential for roosting sites above ground level to be present in those trees within the order limits; and the potential for roosting sites to be present adjacent to order limits? Can the applicant also advise of any potential impacts for bats transiting or foraging across the proposed development site, both during the construction and operational period may be affected.	The Applicant has undertaken extensive surveys of bats, as well as collating records of bats from third parties, to understand the potential for bats to be both roosting and foraging/commuting within the Study Area. These data are presented in **Appendix 9-9: Baseline Report for Bats** of the ES **[APP-090]**. All trees and structures within the Order limits, i.e., those which could be impacted by the Scheme, were subject to an assessment for their suitability to support bat roosts as summarised in **Table 9-2** of **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]** and detailed in **Appendix 9-9: Baseline Report for Bats** of the ES **[APP-090]**. The results of these surveys informed the parameters secured in the **Works Plans [EN010142/APP/2.3(Rev04)]**, with a minimum 15m buffer applied to any tree or structure with bat roost suitability. To clarify, this means that a precautionary approach has been taken with any tree or structure with potential to support a bat roost avoided and as such further surveys to determine actual presence of bat roosts are not required. Specific measures for avoiding impacts on bats during construction are set out in **Table 9-13** of **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]** and the **Framework CEMP [REP5-015]**. The Applicant has considered the potential impacts for bats transiting (commuting) and foraging across the Scheme in **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]** and also responded on this matter in the **Applicant's Response to Examining Authority's First Written Questions [REP3-062]**, Q1.2.9. This assessment has been informed by detailed surveys of activity across the Order limits, as set out **Appendix 9-9: Baseline Report for Bats** of the ES **[APP-090]**. The Scheme design retains all important habitats used by commuting and foraging bats, i.e., hedgerows and woodlands, with all areas of solar PV panels set back from these features. These habitat corridors will be retained through all phases of the Scheme, allowing bats to continue to move across the landscape. As such, no significant adverse effects to transiting and foraging bats will occur. Importantly, the Indicative Landscape Masterplan presented in Appendix A to the **Framework LEMP [EN010142/APP/7.17(Rev06)]** has considered the maintenance of ecological connectivity with areas outside the Order limits. For example, new areas of planting or reinforcing of hedgerows and 'green corridors' link to areas of woodlands and hedgerows occurring outside of the Order limits. This means that commuting and foraging corridors for bats present outside the Order limits will be maintained. The planting of new hedgerows and trees, alongside natural regeneration of woodlands and allowing such habitats to grow tall and wide, will be of benefit to bats by providing additional foraging and commuting corridors as well as potential roosting habitat. The increase in woodland, scrub and hedgerow habitat, creating corridors across the Order limits and likely resulting in an increase in invertebrate abundance (providing additional foraging resources), will, during the lifetime of the Scheme (60 years), be of benefit to bat species. The conversion of arable farmland to grassland habitats will also increase the overall abundance of invertebrate prey and available foraging habitat. **Table 9-17** within **Chapter 9: Ecology and Nature Conservation** of the ES **[APP-040]** concludes that, with the enhancement measures delivered by the Scheme, there will be a minor beneficial effect to bat populations present.

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.2.4	Applicant, NE, LCC, WLDC	**Biodiversity Net Gain** Further to the discussion at ISH3 and points raised in responses at DL3 and DL5, please can the applicant clarify the BNG and habitat provision within the order limits, and identify how much, if any, of that new gain habitat is considered to be land underneath the solar arrays.	The Applicant would refer the ExA to **Appendix F: Data Tables** of the **Biodiversity Net Gain Report [AS-062]**, which sets out all the baseline data used to calculate the net gains. For the grassland underneath and surrounding the panels, the Applicant has considered a worst-case scenario in terms of value and condition of this grassland (presented as 'Grassland – Modified grassland' in 'Poor' condition) to account for the potential impacts that shading will pose (noting that it would potentially be possible to achieve a higher condition) and as such there is minimal uplift generated in units from the existing arable farmland (presented as Cropland – Cereal crops). This grassland type accounts for a total area of 739.56 ha, which has an associated valued of 1,403.67 habitat units. The habitat unit increases are predominantly generated from the creation of higher value habitats proposed across the Order limits. For example, 'Grassland – Other neutral grassland' in either 'Good' or 'Moderate' condition, which will be created in buffer areas between PV arrays and hedgerows/woodlands and Biodiversity Zones, and 'Woodland and Forest – Other woodland; broadleaved' in 'Moderate' condition, which will be created in various parts of the Scheme as visual screening and enhancing connectivity between existing woodland blocks. Equally, uplifts in hedgerow and watercourse units will be generated from enhancement to existing features and creation of new habitats. The distribution of these habitats is shown in **Appendix B: Post-Development Habitat Plan** of the **Biodiversity Net Gain Report [AS-062]**.

3. Climate Change

Table 3-1: Climate Change

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.3.1	Applicant	**The 'Finch Judgement'** Could the applicant please direct the ExA to the assessment of downstream greenhouse gas emissions in light of Judgment R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents)? If necessary, please update the assessment to ensure that the implications of this judgement are addressed.	The Finch judgement (Ref. 1) refers to the downstream GHG emissions that may occur as a result of a proposed development. This is particularly relevant for developments that intend to supply fuel for traditional fossil-fuelled energy generation infrastructure. The focus of the Finch case was on 'inevitable' consequences and effects of a development, in that case the downstream refinement and combustion of oil, resulting in greenhouse gas emissions, was considered to be an 'inevitable' consequence of extracting oil at the relevant site. As explained within the **Applicant's Response to Examining Authority's First Written Questions [REP3-062]** in response to Q1.3.6, the beneficial indirect downstream effects of the Scheme in terms of reduction in greenhouse gas emissions have been considered in the 'future baseline' analysis within **Chapter 7: Climate Change** of the ES **[APP-038]**, where the effects of displacing higher-carbon energy production with renewable energy generation such as solar, are examined. This approach of assessing benefits is consistent with the position taken in Finch (Ref. 1). This case reiterated the need for the relevant planning authority to consider the beneficial indirect effects of a project on the climate, as well as adverse effects, as a material planning consideration: "*Just as beneficial indirect effects of a project on climate - for example, the "green" energy that would be generated by a project to develop a wind farm or solar farm - are clearly a relevant matter for the planning authority to consider, so corresponding adverse effects are also a material planning consideration*" (page 150, Ref. 1).

4. Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations

Table 4-1: Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.4.1	Applicant	**Affected Persons** Can the Applicant provide an update on negotiations with regards to affected persons where heads of terms remain to be agreed?	The Applicant can confirm that heads of terms are now signed with all Principal Site landowners and discussions are advancing with landowners' respective legal advisers. Regarding the heads of terms for the Cable Route Corridor, the Applicant is continuing its detailed engagement with all relevant landowners, including key statutory undertakers such as Network Rail Limited, EDF Energy (Thermal Generation) Limited and the Crown Estate. Terms for all of these named interests are well advanced, and further information in that regard can be found within the **Schedule of Negotiations and Powers Sought [EN010142/APP/4.4(Rev05)]**, along with details regarding all the other Cable Route Corridor negotiations.

5. Cumulative and in-combination effects

Table 5-1: Cumulative and in-combination effects

ExQ3	Questions to:	Question:	Applicant's Response:
No questions			

6. Draft Development Consent Order (DCO)

Table 6-1: Draft Developments Consent Order (DCO)

ExQ3	Questions to:	Question:	Applicant's Response:
Article 40. Trees subject to tree preservation orders			
Q3.6.1	Applicant	The ExA would like to clarify the location of the existing TPOs within the order limits. It is noted in the Applicant's Responses to ExA First Written Questions (REP3-062) in the response to Q2.6.1 it was stated that there are no TPOs within the order limits and that this was reaffirmed at ISH1. However, it notes from the Applicant's Responses to ExA Second Written Questions (REP5-032) under Q2.6.1 this does refer to two trees having TPOs. Please could a drawing be produced to indicate the location of these trees and copies of the TPO information listing their reasons for protection status. Can the applicant advise on the planned works, if any, to these trees.	The Applicant has completed a check of the Tree Preservation Orders (TPO) within the Order limits. The Applicant can confirm that there are no TPOs within the Order limits of the Principal Site, however, there are three TPOs within the Order limits of the Cable Route Corridor. The Applicant has updated **Appendix 12-7: Arboricultural Impact Assessment** of the ES **[EN010142/APP/6.2(Rev01)]** to ensure that these TPOs have been accurately presented and assessed. The three trees within the Cable Route Corridor include a single tree located along an existing track leading into the Cable Route Corridor west of the A165 and two trees within the Cable Route Corridor itself. These trees will be retained and protected with suitable tree protection fencing. Cable routing will be designed to avoid these trees. Any access routes will be diverted, where possible, to avoid the Root Protection Areas (RPAs) of retained trees. Where access cannot be diverted entirely outside of the RPAs, this will be achieved without damage to the RPAs through the use of suitable ground protection to protect roots and soil structure. There are no works proposed by the Scheme to the trees protected by the TPOs and as such, no impacts are anticipated.

ExQ3	Questions to:	Question:	Applicant's Response:
			The location of the three TPOs within the Cable Route Corridor is shown on Sheet 20 of **Annex A: Tree Constraints Plan** and **Annex C: Tree Protection Plan** of the **Appendix 12-7: Arboricultural Impact Assessment** of the ES **[EN010142/APP/6.2(Rev01)]**. The TPOs situated within the Order limits are all registered with WLDC, and their details are as follows: • TPO Name: Brampton 1965 – Date Order Confirmed: 21/04/66 – Species: Willow – TPO Schedule Ref. T50 – Eastings: 483155 – Northings: 380943 • TPO Name: Marton 1965 – Date Order Confirmed: 21/04/66 – Species: Ash – TPO Schedule Ref. T42 – Eastings: 483898 – Northings: 381296 • TPO Name: Brampton 1965 – Date Order Confirmed: 21/04/66 – Species: Ash – TPO Schedule Ref. T51 – Eastings: 483617 – Northings: 380804 There are no records available explaining the reasons for listing the TPOs. However, the making of a TPO may be justified where the tree(s) in question have amenity value, and as such, the making of an Order is required.
Schedule 15 – Protective Provisions			
Q3.6.2	Applicant	Please can the applicant provide an update with regards to the remaining outstanding protective provisions with statutory undertakers and the likelihood of these draft protective provisions being agreed prior to the closure of the examination? In particular can it describe progress with regards to those organisations that agreements are not likely to be reached at the close of the examination.	As of Deadline 6, the following protective provisions have been agreed with the relevant bodies and the versions in the draft DCO submitted at Deadline 6 represent the final form of bespoke protective provisions: • Part 4 - The Canal & River Trust; • Part 5 – Cottam Solar Project Limited; • Part 6 – Gate Burton Energy Park Limited; • Part 7 – West Burton Solar Project Limited; • Part 8 – Lincolnshire Fire and Rescue; • Part 9 – Cadent Gas Limited; • Part 10 – The Environment Agency; • Part 11 – Northern Power Grid (Yorkshire) PLC; • Part 12 – Protection of Railway Interests (Network Rail); • Part 13 – Anglian Water Services Limited as water undertaker; • Part 14 – Uniper; • Part 15 – Exolum Pipeline System; and • Part 16 – EDF Energy.

ExQ3	Questions to:	Question:	Applicant's Response:

The remaining protective provisions included within the draft DCO represent the latest point that negotiations have reached with each party, and therefore are not agreed. These therefore reflect the preferred drafting at this time of the Applicant rather than the relevant statutory undertaker. However, it is noted that negotiations on these remaining parts are in final stages and the large majority of the drafting within the parts are agreed. Specific comments on the status of negotiations for protective provisions with the remaining statutory undertakers is as follows:

- Part 17 – National Grid Electricity Transmission Plc (NGET)
  - The Applicant received the latest round of comments on the draft protective provisions from NGET in the afternoon of 31 March 2025. The Applicant has reviewed these and asked a clarifying query of NGET in the morning of 1 April 2025, relating to new drafting NGET has proposed in respect of its North Humber to High Marnham project. It is the Applicant's position that the additional drafting sought by NGET is not required given there is no spatial overlap between the North Humber to High Marnham project and the Tillbridge Solar Project, such that there will be no overlapping assets for which protective provisions are required to be in place for.
  - Provided NGET respond to this query swiftly within this week, the Applicant considers the remaining points between the parties are minor, and could be resolved and provided prior to the close of examination, at Deadline 7.
  - However, in the interim the Applicant has included its preferred form of protective provisions within the version of the draft DCO provided at Deadline 6. The large majority of these protective provisions are agreed, with the main substantive differences being in respect of the North Humber to High Marnham matter noted above, and minor areas of amendment relating to alignment with the parties' separate agreement. The Applicant therefore requests that the Secretary of State prefer the wording it has included within the Order, should final agreed protective provisions not be able to be presented. The Applicant will make any further submissions in this respect at Deadline 7 of the Examination, should the anticipated agreement not be reached.

- Part 18 – National Grid Electricity Distribution Plc (NGED)
- As acknowledged in previous updates, the Applicant notes that NGED did not provide a relevant representation on the Application, nor has it otherwise engaged in this Examination. However, NGED confirmed to the Applicant on 24 March 2025 that it required bespoke protective provisions for the Scheme, and the parties subsequently began discussions.
- The parties have agreed to use the protective provisions agreed for the benefit of NGED in the West Burton Solar Project 2025 as the basis for protective provisions on Tillbridge, given the only assets held by NGED within the Order limits for the Scheme fall within the Cable Route Corridor as it leads into National Grid Cottam Substation. The parties have agreed to use the protective provisions agreed for the benefit of NGED in the West Burton Solar Project 2025 as the basis for protective provisions on Tillbridge, given the only assets held by NGED within the Order limits for the Scheme fall within the Cable Route Corridor as it leads into National Grid Cottam Substation. As such these assets would experience the same impacts as for West Burton and the other Lincolnshire solar schemes from the shared cable route in this area.
  - NGED has however sought different wording for paragraph 286(3) in respect of the management of third party claims or demands on 28 March 2025. The Applicant continues to prefer the drafting included within the NGED protective provisions in the West Burton Solar Project Order, as it ensures approval by the Applicant of any settlement or compromise made on such demands, which is appropriate given the Applicant will ultimately be liable for these

ExQ3	Questions to:	Question:	Applicant's Response:
			claims. The Applicant also considers it is appropriate for the approach to align between the four Lincolnshire solar projects, given the works in the vicinity of NGED assets may be undertaken by any of the four undertakers per Article 36(3) of the draft DCO. The inclusion of aligned provisions for the management of third party claims is therefore appropriate given if such a claim is to arise it will likely arise for all four projects, and therefore any response will need to be aligned between the four projects. The Applicant therefore requests that the Secretary of State prefer the wording it has included for paragraph 286(3) within the Order. • Part 19 – Trent Valley Internal Drainage Board (TVIDB) o The Applicant received the latest round of comments from TVIDB on the afternoon of 31 March 2025. The Applicant is in the process of reviewing these and preparing a final version of the protective provisions between the two parties for final review by TVIDB and agreement. o From an initial review of the comments, the Applicant considers the remaining points between the parties are minor, and could be resolved and provided prior to the close of examination, at Deadline 7. o However, in the interim the Applicant has included its preferred form of protective provisions within the version of the draft DCO provided at Deadline 6. Should the parties not come to agreement on the remaining matters between them, the Applicant requests that the Secretary of State prefer the wording it has included within the Order, and the Applicant will make submissions on these points at Deadline 7 if necessary. It is not anticipated that there will be any other bespoke protective provisions required other than those listed above.

7. Heritage

Table 7-1: Heritage

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.7.1	Applicant and LCC	**Viking Winter Camp** Could the applicant please provide a response to LCCs response to written question 2.7.6 [REP5-062]? In addition, could both LCC and the applicant please include this matter in the final SoCG? It is essential that any differences between the parties on this matter are established and communicated fully and concisely to the ExA prior to the close of the examination.	With respect of LCC's response to written question 2.7.6 **[REP5-062]** Part H, the Applicant notes the clarification and change of emphasis *'…that substantial harm 'could' not 'would' arise…'*. The assessment of potential impacts to the Winter Camp of the Viking Army at Torksey presented in **Chapter 8: Cultural Heritage** of the ES **[APP-039]** and the consideration harm to the asset were informed by the available baseline evidence, which included the results of surveys undertaken by the Torksey Viking Project and Gate Burton Energy Park Scheme. The baseline evidence has been presented in **Appendix 8-2: Cultural Heritage Desk Based Assessment** of the ES **[APP-059]** and the Applicant's previous response to the ExA's Question 2.7.6 (as set out in the **Applicant's Responses to Examining Authority Second Written Questions [REP5-032]**). The baseline did not identify key elements of the Winter Camp of the Viking Army at Torksey or evidence of significant archaeological remains being present within the proposed Cable Route Access 6. The heritage significance of the asset and its considerable archaeological and historic interest is not disputed, with the Applicant and LCC agreeing the site is of national importance. This is reflected in the high value ascribed to the asset for the assessment of potential impacts and harm.

ExQ3	Questions to:	Question:	Applicant's Response:
			With regard to LCC's response to written question 2.7.6 **[REP5-062]** Part I, the Applicant has had constructive discussions with LCC's Historic Environment Officer and has worked to agree an Archaeological Mitigation Strategy (AMS) **[REP1-025]** that includes specific archaeological investigation and recording (Strip Map and Record excavation) within Cable Route Access 6. The AMS acknowledges the potential for the discovery of unexpected archaeological remains and includes procedures to ensure the implementation of appropriate archaeological mitigation measures. With respect to LCC's response to Parts J and K of written question 2.7.6 **[REP5-062]**, LCC's assertion regarding the application of the "exceptional or wholly exceptional" test set out in paragraph 4.2.17 of NPS EN-1 (Ref. 2) is misleading as it omits critical context provided by the rest of this paragraph and those preceding it. Paragraph 4.2.16 is particularly relevant here, which provides that the Secretary of State will take "as the starting point for decision-making" that CNP infrastructure "is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which required a clear outweighing of harm, exceptionality or very special circumstances." Paragraph 4.2.17 then goes on to set out examples of the policy tests that the Secretary of State "will take as a starting point that CNP Infrastructure will meet". The "exceptional or wholly exceptional" test is one of those listed. As such, while LCC is correct that the "exceptional or wholly exceptional" test continues applies to CNP infrastructure, it is critical to note that the Secretary of State is required under EN-1 to presume as a starting point that the Scheme meets this test as CNP infrastructure. LCC's position, which is to presume that the Scheme does not meet this test, is therefore inconsistent with the requirements of EN-1 (Ref. 2). In terms of whether the CNP presumption is rebutted in respect of the Scheme, the Applicant responded to this point in relation to Part F of written question 2.7.6 – see Appendix E of the **Applicant's Responses to Examining Authority's Second Written Questions [REP5-032]**. The Applicant maintains that the Scheme will result in less than substantial harm to the Winter Camp of the Viking Great Army at Torksey [MLI125067], for the reasons set out and detailed in Appendix C of the **Planning Statement [REP3-027]**. Without prejudice to the Applicant's position, the Applicant also provided a response to the hypothetical scenario posed by the ExA that the harm to this asset could be substantial. It is the Applicant's position that the substantial public benefit derived from the Scheme as CNP infrastructure alongside other significant benefits would result in benefits of sufficient positive weight in the planning balance to justify and outweigh the harm to the heritage asset. In this case, the public benefit of the Scheme would decisively outweigh the level and degree of harm to the heritage asset, even in the hypothetical scenario that this harm is substantial. Agreement on the assessment of the Winter Camp of the Viking Army at Torksey has been recorded in the **SoCG with LCC [EN010142/APP/9.9(Rev03)]**.
Q3.7.2	Applicant	**Viking Winter Camp** The ExA notes the applicant's response to Q2.7.6 [REP5-033] and specifically the references in appendix E, which relate to the extent to which this matter has already been considered in relation to other projects. However, could the applicant please provide a more concise and clear response on the effect of the previously made DCOs on the consideration of this matter. For example, is it the case that the exact same effects would occur in the absence of this project? Is the temporary access location and alignment identical to that consented under other DCOs? Please annotate figure 1 of Appendix E to identify the cable	The Applicant has provided an updated figure within **Appendix A** of this document. Cable Route Access 6 will be shared by the Scheme and other previously made Solar DCO projects, as shown on the amended Figure 1 in **Appendix A** of this document. As such, a single access route would be constructed to serve all the projects, resulting one set of construction impacts which would be mitigated by a single coordinated programme of archaeological mitigation measures. Therefore, the same effects would occur in the absence of the Scheme. This approach has been agreed between the Applicant and the other Solar DCO projects, in acknowledgement of the importance and sensitivity of the Winter Camp of the Viking Army at Torksey and to minimise potential harm to the asset.

ExQ3	Questions to:	Question:	Applicant's Response:
		route and accesses for other DCOs (i.e. where they are the same or similar). If the exact same effects would occur regardless of this project, then what are the implications of this in terms of: a) applying the NPPF test for less than substantial and substantial harm; and b) the overall planning balance to be applied in a hypothetical scenario where substantial harm is identified.	It is possible that Cable Route Access 6 will be constructed by one of the other made Solar DCO projects in advance of the Scheme commencing. In this event potential impacts to any surviving archaeological remains associated with the Winter Camp of the Viking Army at Torksey will have occurred and been mitigated, with no further impact arising from the Scheme. If the exact same effects would occur regardless of the Scheme, then logically the only conclusion that can be reached is that the potential for harm would be removed. This is since any potential impacts of any surviving archaeological remains will have occurred and have been mitigated. In this scenario, there would be no loss of significance to the heritage asset with no harm arising. This will mean that in decision making, the statutory test to preserve the heritage asset would have been met by the other developers. In decision making terms, the test to attach great weight to the conservation of this heritage asset in accordance with paragraph 212 of the NPPF would fall away. The removal of harm (due to the other developers having already dealt with the impacts and mitigated against it) will mean that the impact on this asset would no longer weigh against the Scheme in the planning balance. There would also no longer be a need to weigh the harm against either substantial public benefits or public benefits in accordance with paragraphs 214 and 215 of the NPPF (Ref. 3), depending on the scenario used. With respect to applying the overall planning balance to the hypothetical scenario where substantial harm is identified, the Applicant responded to this point in response to Part F of written question 2.7.6 at Appendix E **[REP5-032]**. It is the Applicant's position that the substantial benefit derived from the Scheme as CNP infrastructure alongside other significant benefits, would result in benefits of sufficient positive weight in the planning balance to justify and outweigh the harm to the heritage asset. In this case, the public benefit of the Scheme would decisively outweigh the level and degree of harm to the heritage asset, even in the hypothetical scenario that this harm is substantial. In terms of the implications of this hypothetical scenario upon the planning balance, increased negative weight would be afforded to this reflecting the increased harm. Section 7 of the **Planning Statement [REP3-027]** sets out the Applicant's overall planning balance. Given that great weight is to be given to any harm to a heritage asset, less than substantial harm to heritage assets has been afforded moderate negative weight. The level of weight to be given to the hypothetical scenario of substantial harm would be increased. Without prejudice to the Applicant's position, substantial harm is significant suggesting that a project would have serious impact on the significance of the asset such that its significance is destroyed altogether or very much reduced. Given this, hypothetically, the harm would increase to substantial negative weight against the Scheme in the planning balance reflecting the harm to a designated asset. However, this would need to be weighed against the substantial public benefits of the Scheme and considered in the context of paragraphs 4.2.16 and 4.2.17 of EN-1 (Ref. 2), which provide that the Secretary of State is to presume as a starting point that the Scheme (as CNP infrastructure) is to be treated as meeting the policy tests relating to substantial harm to a heritage asset. The Applicant draws the ExA's attention to the A428 Black Cat to Caxton Gibbet Improvement Scheme's granted development consent order (18 August 2022). This Scheme comprised the demolition of designated Grade II listed buildings (Brook Cottages) resulting in significant adverse effects to these assets constituting substantial harm. The Case for the Scheme set out the reasons why the substantial public benefit of the Scheme outweighed the loss of the listed building. The ExA found that:

ExQ3	Questions to:	Question:	Applicant's Response:
			"*the substantial public benefits of the Proposed Development over its 60-year lifetime, in terms of meeting transport need, improving road safety and reducing injuries and fatalities, and supporting economic and housing growth over a wide area, would outweigh the substantial harm and loss of significance that would be caused by the removal of Brook Cottages*" (paragraph 8.4.92). In this case, the ExA ascribed the adverse effects of the Black Cat to Caxton Gibbet Improvements Scheme on the historic environment substantial weight against making the Order but despite this reached the view that: *"the likely benefits of the Proposed Development outweigh those matters that weigh against the making of the Order, in isolation or in combination with another.* "(Paragraph 21.3.12). The Secretary of State agreed with the ExA that "*the substantial harm and total loss of significance of Brook Cottages is outweighed by the public benefits of the Proposed Development as set out at paragraph 191, that those benefits are substantial, and that there is no reason for the Secretary of State to refuse consent in accordance with NPSNN paragraph 5.133."* This example is used to demonstrate that, in general terms, substantial harm is a high test and that it is the degree of harm to the asset's significance rather than the scale of the development that needs to be assessed. In the case of the A424 Black Cat to Caxton Gibbet Improvement Scheme, the substantial harm amounted to the demolition and therefore total loss of Brook Cottages, a Grade II listed building. However, despite the degree and scale of harm to these designated assets, development consent was still granted due to the public benefits of the Scheme. In this case, the hypothetical substantial harm to Winter Camp of the Viking Army at Torksey is significantly less. The Scheme has the potential to disturb or remove possible surviving archaeological remains within the Winter Camp, impacting a relatively small section of the overall archaeological site and the majority of the asset remaining preserved and intact and not impacted by the Scheme. Given this scale of impact on its significance, it is clear that even applying hypothetical substantial harm, that this would be outweighed by the substantial public benefits of the Scheme with the balance remaining firmly in favour of granting development consent.

8. Human health, safety, accidents and major incidents

Table 8-1: Human health, safety, accidents and major incidents

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.8.1	Applicant, LCC LFRS	**Fire fighting provisions** Further to the discussions at ISH2 and the applicant's response at DL5 please can the LCC LFRS advise on the adequacy of the access and turning arrangements for fire fighting response, including the local highways approach to the site for passing for vehicles, the provision of access with regards to wind direction and adequacy of access and	The Applicant met with LFR on 13 March 2025 and final BESS-Solar Station Compound layout requirements for vehicle access were agreed. The Applicant emailed LFR the Compound layout drawings on 18 March 2025 for approval, and LFR confirmed their approval by email on 31 March 2025. LFR also confirmed that they are satisfied that now this matter is fully addressed, there are no further issues to resolve for the **Framework BSMP [REP4-026]**. The agreement of the **Framework BSMP [REP4-026]** has also been recorded within the **SoCG with LCC [EN010142/APP/9.9(Rev03)]**.

ExQ3	Questions to:	Question:	Applicant's Response:
		turning once on site. Can the applicant provide an update with regards to the ongoing discussions with LCC LFRS in this respect and the status of the FBSMP.	
Q3.8.2	Applicant, LCC LFRS	**Community Warnings** The ExA notes the applicant's response to Q2.8.3 of Applicant's Responses to ExA Second Written Questions (REP5-032). Specifically the section "*The Applicant expects that LCC and LFR would finalise any local community alert protocols they would be responsible for when the Emergency Response Plan was drafted"* and queries the progress with regards to this and also LCC's view as member of the Local Resilience Forum and how these community warnings might be triggered and issued.	The Applicant notes that LCC has clarified this position on Community Warnings in their response to Q2.8.3 **[REP5-062]**, therefore all parties are aligned. The Emergency Response Plan is drafted at the detailed design stage when the BESS system has been selected and the final BESS site layout design has been agreed and fully risk assessed, as stipulated in Section 6 of the **Framework BSMP [REP4-026]**.
Q3.8.3	Applicant	**Potential for Heat Island Effect** The ExA notes the applicant's response to Q2.8.3 of Applicant's Responses to ExA Second Written Questions (REP5-032). The ExA notes that there is currently no consensus on this phenomena. However it requests that the applicant consider this potential for the reasonable worst case scenario and its likely impacts including consideration of the elevated temperatures with respect to local community health and the operating environment for the BESS.	The Applicant assumes the ExA is referring to Q2.8.1 within the **Applicant's Response to Examining Authority's Second Written Questions [REP5-032]**, which addresses potential changes to the local climate. As described in the response to Q2.8.1 within the **Applicant's Response to Examining Authority's Second Written Questions [REP5-032]**, the potential worst-case scenario of localised heating within the centre of a solar installation is up to 4°C during the night, 2.5m above the ground (as described by Barron-Gafford et al. 2016 (Ref. 4)). The analysis from Fthenakis & Yu (2013) (Ref. 5) has suggested that this heating effect is very localised, reducing to under 0.5°C with 5m of elevation and 300m of horizontal distance. This localised increase in ambient temperatures would have no significant effect on either human health or the operating conditions of the BESS, due to the scale of temperature change and the distance from the centre of solar PV areas.

9. Landscape and visual impact

Table 9-1: Landscape and visual impact

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.9.1	Applicant	**Mitigation** ES section 12.7 [REP4-014] and pages 33 to 37 of the Environmental Mitigation and Commitments Register [REP3-021] outline 'embedded' mitigation measures. However, these documents include aspects of mitigation which might normally be considered to go beyond what is 'embedded' in the scheme design. For example: ▪ 'Provision of woodland screening'. ▪ 'Improvement of field boundaries'. ▪ 'Provision of woodland or shelter belt planting'.	For the purposes of this ES, the Applicant has considered the landscaping proposals, listed by the ExA, as embedded mitigation for the assessment presented within **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]**. This is because these measures are included within the **Framework LEMP [EN010142/APP/7.17(Rev06)]** and are reflected within the **Indicative Landscape Masterplan**, included within **Appendix A** of the **Framework LEMP [EN010142/APP/7.17(Rev06)]**. As set out within paragraph 4.6.3, the detailed design of the Scheme would be in substantial accordance with these plans, as secured through Requirement 7 of the **draft DCO [EN010142/APP/3.1(Rev07)]**. As such, these measures have been considered to form an inherent part of the Scheme consented through the **draft DCO [EN010142/APP/3.1(Rev07)]**.

ExQ3	Questions to:	Question:	Applicant's Response:
		▪ 'Provision of green infrastructure'. Could the applicant please explain the approach to embedded and additional mitigation? Bearing in mind that LSE should include the effects of the development without 'additional mitigation' with residual effects to include 'additional mitigation' as per ES paragraphs 5.4.1 to 5.4.5 [APP-036]. Please refer to the relevant IEMA guidance and correct the assessment accordingly if required.	The assessment of likely impacts and effects within the ES follows the consideration of embedded mitigation, thereafter there is the identification of any necessary additional mitigation, as set out within paragraphs 5.1.11 (f) and (g) of **Chapter 5: EIA Methodology** of the ES **[APP-036]**. Further explanation of 'embedded mitigation' considered within the ES is provided within **Table 5-4** of **Chapter 5: EIA Methodology** of the ES **[APP-036]**. This methodology has been adopted within all technical chapters of the ES and is identified through the subheadings of 'Embedded Design Mitigation', 'Assessment of Likely Impacts and Effects' and 'Additional Mitigation, Monitoring and Enhancements' within each technical chapter. This approach aligns with IEMA guidance *'Delivering Quality Development*' (Ref. 6) and the more recent '*Implementing the Mitigation Hierarchy from Concept to Construction'* (Ref. 7). The Applicant does not consider any update is required to the assessment provided within **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]**.
Q3.9.2	Applicant	**Year 15** Section 6.8 of the ES non-technical summary [AS-025] outlines that there would be significant visual effects for 11 representative viewpoints during year 1 of operation, with significant visual effects for 3 viewpoints after during year 15. In particular there are two VPs where residual effects are reduced from 'Major Adverse' in year 1 to not significant by year 15. They are VP2b and VP19. Could the Applicant explain why this is, with reference to the conclusions of the ES where relevant?	The reduction in effects from major adverse (significant) at Construction and Year 1 of Operation to minor adverse (not significant) at Year 15 is due to a range of factors. As noted in **Appendix 12-6: Assessment of Visual Effects** of the ES **[REP3-009]**, the solar infrastructure will be dominant and very incongruous at the Construction and Year 1 (Operation) stages, given the extensive change across the open view for Viewpoint 3 (Harpswell Lane); and where existing low-cut hedgerows will provide only limited screening for Viewpoint 19 (School Lane). At the Year 15 stage, the assessment notes for Viewpoint 2 the loss of long-distance views of intensively farmed fields to be replaced by a strong sense of enclosure; and for Viewpoint 19 the change from an open character to a one that is enclosed. Broadly, the Applicant considers that the loss of an open view and the presence of incongruous solar infrastructure is significant; whilst a loss of such a view through presence of native hedge and woodland planting, which is typical of the wider agricultural context, is not significant. As noted previously in **Appendix A** of **Applicant's Responses to Local Impact Reports [REP3-061]** (ref. 5.15 within **Table 2-1**)**,** aerial mapping indicates the planting of woodland blocks and belts at locations within and adjacent to the Principal Site over the past 20 years. This includes an approximately 200 m long woodland block immediately to the north of Viewpoint 2 which would have substantially changed the open view at this location. Such planting has and will continue to be undertaken by landowners outside the planning system, through government funding and grant schemes, with objectives including the restoration of historic landscape patterns, provision of ecological corridors and the enhancement of green infrastructure. With reference to Viewpoint 19, similar principles may also apply to existing hedgerows, including where they may be managed at taller heights; or enhanced through tree and more diverse hedge species planting. Whilst the Applicant acknowledges the change in the open character for Viewpoint 19, it considers that the view provides limited value aside from openness and a degree of tranquillity. As noted in the **Appendix 12-4: Representative Viewpoint Descriptions** of the ES **[APP-106]**, it encompasses generally functional elements including 11kv overhead power lines and utilitarian outbuildings associated with the red brick Hermitage Low Farm; with interest provided by occasional woodland blocks and mature hedgerow trees, although some of the latter suffering ash dieback. The baseline description for Viewpoint 19 references similar characteristics, whilst noting views of moving traffic along the A631. Tree and hedge planting will undoubtedly foreshorten these representative views, but this should be considered alongside the provision of more immediate appreciable, positive features of interest such as winter structure, flowers, fruit; and ecological benefits including increased insect numbers, birds and

ExQ3	Questions to:	Question:	Applicant's Response:
			birdsong. Overall, the Applicant considers that the minor adverse visual effects for these two representative viewpoints is an appropriate balance of these factors.
Q3.9.3	Applicant	**ES Tables 18-12 to 18-18** During ISH3, the applicant explained that the fifth column of ES tables 18-12 to 18-18 [REP5-013] is the cumulative effect to be added to the residual effect of the proposed development in isolation (column 2). However, the ExA would like the applicant to explain where this addition (i.e. the sum total) of the effects is set out. Taking just one example: Table 18-12 sets out that the residual effect of the proposed development in isolation on LLCA 5a is 'minor adverse'. The cumulative effect on this LLCA is identified as 'Moderate adverse (significant)'. What does that mean for the overall conclusions on this effect? As the two effects differ. It is accepted that in the majority of cases the effects in the fifth column match those in the second. In such instances, is the assumption that the overall effect would also be the same? It would be helpful if the applicant could add an additional column to these tables to explain what the sum total effect is as a result of the cumulative effects identified, with a brief explanation for the conclusions reached. Note: notwithstanding this query and the applicant's position at ISH3, the brackets seem to suggest that the final column is actually the sum total of the effects. But in other instances that can't be the case (for example VP8 in table 18-16). Effectively, the ExA would like the applicant to update the tables to make clear where (for which VPs) the cumulative effects are greater than for the scheme in isolation.	The Applicant has reviewed and updated **Tables 18-12** to **18-18** within **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev04)]** and submitted a revised chapter at Deadline 6. The Applicant confirms that the last column of these tables does outline the overall effect, considering effects from both the Scheme and any cumulative developments. Where required, the Applicant has updated and clarified the rationale with regards to the contributions of the Scheme and cumulative developments. With reference to VP8 specifically, the minor (not significant) visual effect of the Scheme in isolation and slight adverse (not significant) cumulative effect overall is considered to be a worst-case, reflecting the higher sensitivities derived from heritage assets associated with Fillingham Castle. This is because views towards the Scheme from such assets are, in reality, expected to be screened by woodland. Furthermore, it is noted that for the equivalent viewpoint within the Cottam Solar Project [EN010133] LVIA, no significant effects with respect to both that scheme in isolation and cumulatively were assessed. The Applicant has also made updates to **Table 18-15** with regards to the effects on LLCA 3a Till Vale Open Farmland during the decommissioning phase and **Table 18-17** with regards to the cumulative effects on viewpoints along the Cable Route Corridor during the construction phase. No new significant effects have been identified.
Q3.9.4	LCC	**Visual effects** LCCs LIR [REP1A-001] outlines that viewpoints 2b and 20 currently comprise open views across fields. It is understood that whilst LCC agrees that the visual effects on these views during construction and operation would be 'high' it disagrees that this would reduce to 'low' at year 15. This is because it considers that the proposed planting would foreshorten existing open views, resulting in a 'medium' magnitude of visual effect and increasing the visual effect and significance. Similarly, with regard to viewpoint 4, LCC disagrees with the applicant's assessment. It considers this viewpoint to comprise an open panoramic view across an agricultural landscape with a magnitude of visual effect which is 'high' during construction and year 1 of operation. LCC considers	No response required from the Applicant.

ExQ3	Questions to:	Question:	Applicant's Response:
		that the development would be conspicuous in an extensive part of the view and that these effects would be experienced along several sections of the B1398. The implication seems to be that the significance of effects is underestimated by the applicant. However, could LCC please explain what it considers the significance of the effect in both cases to be? Would there be significant adverse effects for VPs 2b, 20 and 4 or would they remain 'not significant'?	
Q3.9.5	Applicant	**Decommissioning** 7000 Acres WR [Rep2-018] states in part: "*The act of carrying out this decommissioning process, along with any resultant damage to the land and landscape across this vast Scheme will in our opinion have a significant effect on views."* Could the Applicant please provide a response?	The Applicant maintains that no significant visual effects will arise for representative viewpoints and, as a worst-case, the minor adverse (not significant) visual effect is appropriate for this stage, as set out at paragraphs 12.8.39 to 12.8.40 and **Table 12-7** of **Chapter 12: Landscape and Visual Amenity** of the ES **[REP4-013]**. This conclusion is also set out within **Appendix C** to the **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046]**. At the year 60 decommissioning stage, woodland and trees (including those within hedgerows) will be considered as mature and at or close to maximum height. The level of screening throughout the Principal Site will be such that views of activities associated with decommissioning will be very limited. The Applicant acknowledges that there will be localised increases in traffic movement; but overall, these will be short-term, limited in nature and reversible. The visual assessment also considers the reversion of the solar panel and infrastructure areas to agricultural use as a beneficial effect, consistent with the adverse effects that are reported through the introduction of such features. Consideration should also be given to the long-term visual benefits of the presence of structural planting and ecological corridors at this stage.

10. Noise and Vibration

Table 10-1: Noise and Vibration

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.10.1	Applicant	**Requirement 17** The ExA notes the applicant's responses to Q2.10.2 and 2.10.3 [REP5-032]. However, the ExA was enquiring as to the applicant's opinion on a revised requirement (which does not only apply at pre-construction) whereby noise monitoring (at source) is undertaken and submitted to the local authorities. The applicant implies that this is unnecessary as noise monitoring is already controlled by dDCO Requirement 13 (R13) and the associated fOEMP [REP4-0023]. However, R13 only requires that the OEMP is implemented as approved and maintained throughout the operation of the relevant parts of the authorised development to which the plan relates. Table 13-8 of the fOEMP does not set out any	As described in the Applicant's response to WLDC's written representations within the **Applicant's Comments on Interested Parties' Submissions to Second Written Questions at Deadline 5 [EN010142/APP/9.19]** (ref.2.10.2 and 2.10.3), the **Framework OEMP [EN010142/APP/7.9(Rev04)]** has been updated to provide a more precise and definitive solution to be secured in an event where noise levels exceed those set out in **Chapter 13: Noise and Vibration** of the ES **[AS-006]** (including a more precise definition of 'regular monitoring'). **Table 3-8** of the **Framework OEMP [EN010142/APP/7.9(Rev04)]** now clarifies that: *"Site staff will carry out noise monitoring of the substation transformers, inverters and BESS as part of the annual maintenance regime described in paragraph 2.3.2. This will include identifying any changes in sound pitches or volume early and carrying out the relevant maintenance*". and that "*the results of such monitoring will be submitted to the relevant planning authority for review. Where this review indicates plant noise levels generated by the Scheme have increased beyond those presented in the ES, the undertaker and relevant planning authority will liaise in respect of the appropriate further maintenance or mitigation required to reduce levels at receptors back to those presented in the ES. Measures could include repair and*

ExQ3	Questions to:	Question:	Applicant's Response:
		concrete implications in circumstances where noise levels are higher than those set out in the ES. It states: *'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'* The requirement to 'liaise' does not necessitate any form of conclusion or remedy and neither does it allow for any effective enforcement. On this basis - bearing in mind that there may only one more opportunity for the applicant to address this matter prior to the close of the examination - could the applicant please provide representations on revisions to R17, to incorporate noise monitoring at source during operation? Alternatively, could the applicant please revise the wording at Table 13-8 (fOEMP) to allow for a more precise and definitive solution to be secured in an event where noise levels exceed those set out in the ES (including a more precise definition of 'regular monitoring'). In providing a response please refer to WLDCs response to the ExAs written questions (2.10.2 and 2.10.3) [REP5-061].	*maintenance of the plant, sourcing quieter plant, barriers or enclosures. 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. The operator would then be responsible for implementing the agreed mitigation measures and issuing a revised set of results, demonstrating that the noise levels from the Scheme are at or below the levels presented in the ES.* It also sets out that "*Separate to the annual monitoring programme, in the event of a complaint concerning noise from the Scheme from a neighbouring receptor, the operator would liaise with the relevant planning authority over the need for further monitoring and, if required, take updated sound measurements of relevant plant at locations and timings agreed with the relevant planning authority. If these measurements of relevant plant demonstrated that agreed levels coming from the Scheme are likely being exceeded at the receptor in question, the operator would then be responsible for implementing mitigation agreed with the relevant planning authority.*" These updates have been agreed with WLDC in the **Statement of Common Ground with West Lindsey District Council [EN010142/APP/9.8(Rev04)]** and with LCC in the **Statement of Common Ground with Lincolnshire County Council [EN010142/APP/9.9(Rev03)].**
Q3.10.2	Applicant	**Requirement 17** Please could the applicant provide a response to WLDCs response to Q2.10.4 [REP5-021]?	The Applicant has provided a response to this within **Table 2-1** of the **Applicant's Response to Interested Parties Submissions to the Examining Authority's Second Written Questions [EN010142/APP/9.39]**, ref Q2.10.4.

11. Socio-economic effects

Table 11-1: Socio-economic effects

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.11.1	Applicant	**Residential Amenity** The ExA notes the applicant's response to Q2.11.2 [REP5-032]. Is the applicant suggesting that chapter 14 only deals with effects on amenity insofar as they relate to communities (as opposed to individual receptors)? If this is the case, then where in the application documents has the effect on residential amenity of individual receptors been assessed (bearing in mind the in-combination effects identified in ES Chapter 18)?	The Applicant confirms that the ExA's interpretation is correct. An assessment of potential amenity effects on individual residential properties has been presented within **Chapter 18: Cumulative Effects and Interactions** of the ES **[EN010142/APP/6.1(Rev04)]** within **Table 18-7** and **Table 18-8**, through the consideration of in-combination effects rising from air quality, landscape and visual amenity, noise and vibration and transport on individual receptors. The only significant effect identified included a moderate adverse (significant) effect on Hermitage Low Farmhouse during the construction and decommissioning phases. This effect is temporary and would only be experienced within the construction and decommissioning phases. The **Planning Statement [REP3-027]** at paragraph 6.17.14 reaffirms the temporary significant effect on the occupiers of Hermitage Low Farmhouse during construction. The appraisal of cumulative effects and interactions has not made explicit reference to this impact. The Applicant would afford limited negative

ExQ3	Questions to:	Question:	Applicant's Response:
			weight to this impact given the short duration of the combined effects to this residential receptor with no resultant change in the overall planning balance as set out in Section 7 and summarised in paragraph 7.4.36 (page 145) of the **Planning Statement [REP3-027]**.

12. Soils and Agriculture

Table 12-1: Soils and Agriculture

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.12.1	Applicant	**Future grazing potential of the operational site** The ExA appreciates the applicant's previous responses to the questions raised about grazing potential and the opportunity for others to graze the site should they be inclined. Could the applicant please comment on the likely context should grazing not be taken up and the potential impact this may have on loss of agricultural yields at the site versus the existing situation, appreciating that arable and cattle yields are not directly comparable.	It is not possible to give an objective, direct answer to the question regarding comparison of agricultural yields. The ALC guidelines (page 8) (Ref. 8) note that to ensure a consistent approach when classifying land, it is graded according to the degree to which physical or chemical properties impose long term limitations on land use. It is also assessed assuming a good but not outstanding standard of management regardless of the standard of management found while being surveyed. If yield was considered as part of the impacts of the Scheme, with all of the variables that affect yield and the complexity in describing yield, then the consistent approach to classifying land would be lost. Yield is a difficult benchmark as, expressed in tonnage, a higher yielding field that necessitated higher inputs may be less profitable. Gross margins for crops vary with the cost of inputs (nitrogen fertiliser prices being closely associated with international gas prices) and the market price of that commodity. Weather conditions impact on yield tonnage, quality, cost of production and market price. None of these factors can be predicted with sufficient accuracy for the next crop in a rotation. Also, farmers can manage for higher or lower yielding crops, depending on the market conditions. Farmers across the region on similar soils are contending with issues, including loss of pesticides (e.g. neonicotinoid insecticide) and the buildup of herbicide resistance in arable weeds, such as black grass. Farmers are increasingly putting fields into Sustainable Farming Initiative (SFI) measures, such as pollen and nectar mixes, where there is little or no food or fibre production from the land for that year. Arable farmers are choosing to enter into options for solar farms as they are familiar with the trends of declining soil health, low margins, volatile input prices, loss of pest control and risks from adverse weather. As such, existing and future cropping yields of the land cannot be accurately described. Given that grazing by sheep is a cost-effective means of managing vegetation in a solar farm, it is highly unlikely that grazing will not be taken up in the solar farm operational period. As noted at the Open Floor Hearing 2, one of the farms within the Order limits of the Scheme is already grazing sheep on other operational solar farms in the area **[REP4-121]**.
Q3.12.2	Applicant	**Agricultural Land Classification** Further to the applicant's response at DL5 the ExA notes the approach taken by the applicant, but would request the applicant provides an additional short summary breakdown of land type by area and mapping to meet the requirements the Governments Written Ministerial Statement "Solar and protecting our Food Security and Best and Most Versatile (BMV) Land" made on 15 May 2024.	The Applicant has provided a response to this question in **Appendix B: Breakdown of land type by area within 5 mile radius of the Principal Site** of this document. To inform the above, the Applicant reviewed **Appendix A** of the **Applicant's Response to Examining Authorities Second Written Questions [REP5-031]** which set out 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.

ExQ3	Questions to:	Question:	Applicant's Response:

The Applicant has also reviewed the Government's Written Ministerial Statement "*Solar and protecting our Food Security and Best and Most Versatile (BMV) Land*" made on 15 May 2024 (Ref. 9) and notes that it sets out that '*applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land.'*

The Applicant acknowledges that this is consistent with paragraph 2.10.29 of NPS EN-3 (Ref. 10) which states:

> *"While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land."*

The Applicant also directs the ExA to **Chapter 4: Alternatives and Design Evolution** of the ES **[APP-035]**, which demonstrates that the Applicant considered the suitability of previously developed and brownfield land for the Scheme.

To respond further, the Applicant has undertaken a further search of the following land types, and set these out on the updated map at **Appendix B**, as well as a table summary of the areas and percentages of these land types:

- Urban Land
- Industrial Land
- Brownfield Land/Previously Developed Land
- Contaminated Land
- Rural Land
- Area of Solar PV

The updated map and table at **Appendix B** demonstrate the lack of industrial land within a 5-mile radius. These sites are protected within the adopted Central Lincolnshire Local Plan (Ref. 11) as existing employment sites to be retained in such use contributing towards the strategic employment land supply within the District in accordance with Policies S31 (Important Established Employment Areas) and S32 (Local Employment Areas). A change of use from non-employment use would be a departure from the Development Plan. As such, they are not available for alternative uses.

There are only three brownfield sites within a 5-mile radius of the Principal Site with a combined area of 2.27 hectares and there is no contaminated land within the search area as defined by Part 2A of the Environmental Protection Act 1990 (Ref. 12).

The above, along with **Chapter 4: Alternatives and Design Evolution** of the ES **[APP-035]** confirms that the use of agricultural land for the Scheme is justified and necessary. In addition, the site selection process undertaken also confirms that the Applicant sought to utilise land of a poorer agricultural quality before utilising higher quality land through avoiding Grade 2 land as shown on provisional mapping. This is illustrated on the map to **Appendix B: Breakdown of land type by area within 5-mile radius of the Principal Site** where the Grade 2 land is located to the east of the Principal Site extending in a broad north-south direction.

ExQ3	Questions to:	Question:	Applicant's Response:
			This further demonstrates compliance with the Written Ministerial Statement (Ref. 9) with respect to : "Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible." The Applicant has demonstrated throughout the DCO process that the Scheme is located primarily on lower quality agricultural land, with the majority of the Scheme (>95%) being on non-BMV land and has proved that the use of agricultural land is necessary and that poorer quality land has been preferred to higher quality agricultural land thereby being fully in accordance with policy.

13. Transport and access

Table 13-1: Transport and access

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.13.1	Applicant	**Sensitive Receptors** Please could the applicant provide a response to WLDCs response to written questions 2.13.8 and 2.13.9 [REP5-061]? Update the ES if necessary.	The Applicant has provided a response to this within **Table 2-1** the **Applicant's Response to Interested Parties Submissions to the Examining Authority's Second Written Questions [EN010142/APP/9.39]**, ref. Q2.13.8 and ref. Q2.13.9.
Q3.13.2	WLDC/LCC	**ATC23** Could WLDC and LCC please confirm the acceptability or otherwise of changes to the application highlighted in the Applicant's response to Q2.13.11 [REP5-032]?	No response from Applicant required.

14. Water environment including flood risk

Table 14-1: Water environment including flood risk

ExQ3	Questions to:	Question:	Applicant's Response:
Q3.14.1	Applicant, LCC LFRS	**Water storage for fire fighting purposes** Further to discussions at ISH2 & 3 please can the applicant comment on the progress made with regards to defining how water will be stored and provided at the site for fire fighting purposes. Can this commentary address the concerns that were raised with regards to seasonal availability of supply during periods of drought, the independence of any water stored for any integral fire fighting systems and the residual availability of water for fire fighting responders; and how	As stipulated in the **Table 2-1** of the **Framework Battery Safety Management Plan (BSMP) [REP4-026]**, each BESS-Solar Station Compound will be designed to integrate pressure fed (pump driven) fire hydrants and/or static water tanks (tanks can be integrated above or below ground) for firefighting, depending on available water supply. The supply of water to the water tanks will be brought in via commercial suppliers to ensure no pressure on local mains supply during periods of drought. Once present on site, the stored water is unlikely to be required and therefore would not cause an ongoing demand for the area (as it will not need to be continually re-supplied). Water provision will be designated for the cooling of adjacent BESS or ESS equipment by fire fighting services (see further discussion regarding water for any automated services below). Water tanks will be

ExQ3	Questions to:	Question:	Applicant's Response:
		supplies might be maintained during any ongoing fire fighting incident.	located at least 10m from the nearest BESS enclosure. Water access points, whether hydrants or tank connections, would be located in consultation with the Lincolnshire Fire Rescue (LFR) to provide redundancy and safe operating distances for firefighters. The number of water tanks and volume of the water supply for use by fire fighting services will be agreed with the LFR and be validated by an Independent Fire Protection Engineer based upon BESS full scale destruction testing. Current NFCC guidelines (as of March 2025) (Ref. 13) stipulate tanks and/or hydrants should be capable of delivering no less than 1,900 litres per minute for at least 2 hours to each BESS-Solar Station Compound, for use by fire fighting services. The firefighting water requirement will be fully assessed at the detailed design stage based upon BESS fire and explosion test data by an independent Fire Protection Engineer and water storage volumes will be agreed with Lincolnshire FRS (LFR) during detailed design, water will not have to be brought in from off-site sources. They must be easily accessible to LFR vehicles, and their siting should be considered as part of a risk assessed approach that considers potential fire development / impacts. Paragraph 7.8.3 of the **Framework BSMP [REP4-026]** stipulates: Site and BESS design principles and ERP content will ensure that the LFR are expected to employ a defensive strategy i.e. only boundary cooling should be employed for cooling of adjacent BESS Enclosures or ancillary equipment, this ensures that environmental pollution risks are minimised. Boundary cooling typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. NFCC revised guidance (Ref. 13) states: *"If it can be confirmed that the recommended firefighting tactic for the BESS is to defensively fire fight and boundary cool whilst allowing the BESS to consume itself, this will reduce the water requirements, and thus the drainage/environmental protection requirements significantly."* Firefighting water used for boundary cooling should not be polluted (but will be tested before use) and can be reused for firefighting if additional water is required by LFR. Typically, if firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these "boundary cooling" tactics would likely be applied intermittently in 15-minute application periods with temperature changes measured between application periods. This will mean the minimum "two hour" supply referred to above will be sufficient for a greater period of time (as firefighting efforts may not continuously use 1900 litres an hour) at each BESS-Solar Station Compound. This, consistent with the NFCC Guidance (Ref. 13), is considered sufficient to manage the typical peak burn times of typical BESS failure incidents (those times having been set out in previous responses including within the **Written Summary of Applicant's Oral Submissions at the ISH3 [REP4-049]**. If LFR require additional water supplies, firefighting water captured in the compound drainage system can be tested and reused, or water could be used from an adjacent BESS-Solar Station compound. The Applicant will ensure that potable water supplies for static water tanks are compliant with all UK legislation for the provision of water for firefighting, this includes continuity of supply and all maintenance checks and requirements. As stipulated in the **Framework BSMP [REP4-026]**, final BESS and site-specific risk analysis will assess the need to integrate a dry pipe spray or sprinkler system. This can be connected to the water supply by LFR if the incident response team decide direct suppression tactics are required, this would be a separate dedicated water supply. A spray system reduces the impacts of water damage to battery modules which may not been involved in a fire, typically a system will discharge 20-100 litres per minute per nozzle requiring significantly lower volumes of water compared to 1,900 litres per minute specified for firefighter boundary cooling.

ExQ3	Questions to:	Question:	Applicant's Response:
			As stipulated in Section 5.3 of the **Framework BSMP [REP4-026]**, at the detailed design stage the Applicant will select a BESS design integrated within a BESS-Solar Station layout that minimises the requirement for direct LFR intervention.
Q3.14.2	Applicant, EA	**NAFRA update** What is the context for flood risk for the proposed development based on the new National Flood Risk Assessment (NaFRA) dataset launched by the Environment Agency in 2024?	The Applicant has reviewed the New National Flood Risk Assessment (NaFRA) data (Ref. 14) published for the Site and has summarised the changes to the flood extents from rivers in the table below.

Element of the Scheme within the updated extent of flooding from rivers	Review
Fields 51, 56 and 57	**Appendix 10-3: Flood Risk Assessment** of the ES **[REP4-018]** provided a detailed review of flood risk to these fields on the basis of which minimum solar panel height of 20.06m AOD within these fields were specified within the **Outline Design Principles Statement [REP4-020]**. The newly published flood mapping indicates a greater flood extent within Field 56, above 20.06m AOD; however, **Appendix 10-3: Flood Risk Assessment** of the ES **[REP4-018]** provides a more detailed assessment of flood risk to these fields, compared to the high-level mapping published for the Yawthorpe Beck. As such the assessment presented within **Appendix 10-3: Flood Risk Assessment** of the ES **[REP4-018]** is considered to remain valid.
Field 70	The updated NaFRA data indicate the extension of flood extents into Field 70. However, the flood extents only extend into areas of proposed landscaping, with no overlap with proposed solar infrastructure.
Principal Site Access 3	The updated NaFRA data indicate the extension of flood extents across Principal Site Access 3. This is an existing access that is proposed to be used during the operation of the Scheme only. No raising of ground levels is proposed at this location and as such, the use of the access for operational purposes will not impact on flood risk.
Field 77	From a review of the topographical survey and the mapping extents for flooding for up to the worst case extent, for up to 1.2m depth, the maximum depth the water would reach in this field is approximately 200mm; with panels set a minimum 600mm above ground level, it is considered mitigation to raise panels in Field 77 is not required.
Field 68	The lowest ground levels along the southern boundary of Field 68 fall from east to west, from 17.56m AOD, to 16.76m AOD. Comparing the topographical survey to the long-term fluvial flood risk mapping and applying the mapping extents for up to the worst case extent, for up to 1.2m depth, the maximum flood depths relative to the lowest perpendicular ground levels are no greater than 240mm (i.e. in cross section across the floodplain). With a minimum panel height of 600mm above ground, the flood depth at any given point for solar PV panels in Field 68 will not reach the base of the panel with at least 300mm freeboard still afforded. Therefore, it is considered no mitigation is required within Field 68.

15. Other planning matters

Table 15-1: Other planning matters

ExQ3	Questions to:	Question:	Applicant's Response:
No questions			

16. References

Ref. 1 Judgment R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents). (n.d.). A

Ref. 2 Department for Energy Security and Net Zero (2024). Overarching National Policy Statement for Energy (EN-1). Accessed on 20/03/2025 at https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1

Ref. 3 Department for Levelling Up, Housing and Communities (2024). National Planning Policy Framework. Accessed on 20/03/2025 at: https://www.gov.uk/government/publications/national-planning-policy-framework--2

Ref. 4 Barron-Gafford, G., Minor, R., Allen, N. et al. The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures. Sci Rep 6, 35070 (2016). https://doi.org/10.1038/srep35070

Ref. 5 V. Fthenakis and Y. Yu, "Analysis of the potential for a heat island effect in large solar farms," 2013 IEEE 39th Photovoltaic Specialists Conference (PVSC), Tampa, FL, USA, 2013, pp. 3362-3366, doi: 10.1109/PVSC.2013.6745171

Ref. 6 IEMA (2016). EIA Guide: Delivering Quality Development.

Ref. 7 Beadle, Burgess, Callaghan, Howard, Knott, Riley, Walker et al. (2024) IEMA Guidelines: Implementing the Mitigation Hierarchy from Concept to Construction

Ref. 8 Ministry of Agriculture, fisheries and Food (1988). Agricultural Land Classification of England and Wales. https://publications.naturalengland.org.uk/publication/6257050620264448

Ref. 9 Department of Energy Security and Net Zero (2024). Written Ministerial Statement "Solar and protecting our Food Security and Best and Most Versatile (BMV) Land" made on 15 May 2024. Available at https://questions-statements.parliament.uk/written-statements/detail/2024-05-15/hcws466#:~:text=As%20is%20outlined%20in%20the,and%203a%20of%20the%20Agricultural

Ref. 10 Department for Energy Security and Net Zero (2024). National Policy Statement for Renewable Energy Infrastructure (EN-3). Accessed on 20/03/2025 at https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3

Ref. 11 Central Lincolnshire Joint Strategic Planning Committee (2023). Central Lincolnshire Local Plan.

Ref. 12 HMSO (1990). The Environmental Protection Act 1990 (as amended). Available at https://www.legislation.gov.uk/ukpga/1990/43/contents
Ref. 13 National Fire Chiefs Council (NFCC) 2023, Grid Scale Battery Energy Storage System planning – Guidance for FRS
Ref. 14 Environment Agency (2025). New National Flood Risk Assessment (NaFRA). Flood Map for Planning. Available at https://flood-map-for-planning.service.gov.uk/

Tillbridge Solar

Tillbridge Solar Project

EN010142

Appendix A – Figure to support ExQ3.7.2 response

Document Reference: EN010142/APP/9.40

Planning Act 2008
The Infrastructure Planning (Examination Procedure) Regulations 2010

April 2025
Revision Number: 00

Revision: 0 Drawn: LL Checked: IW Approved: CW Date: 2025-03-27

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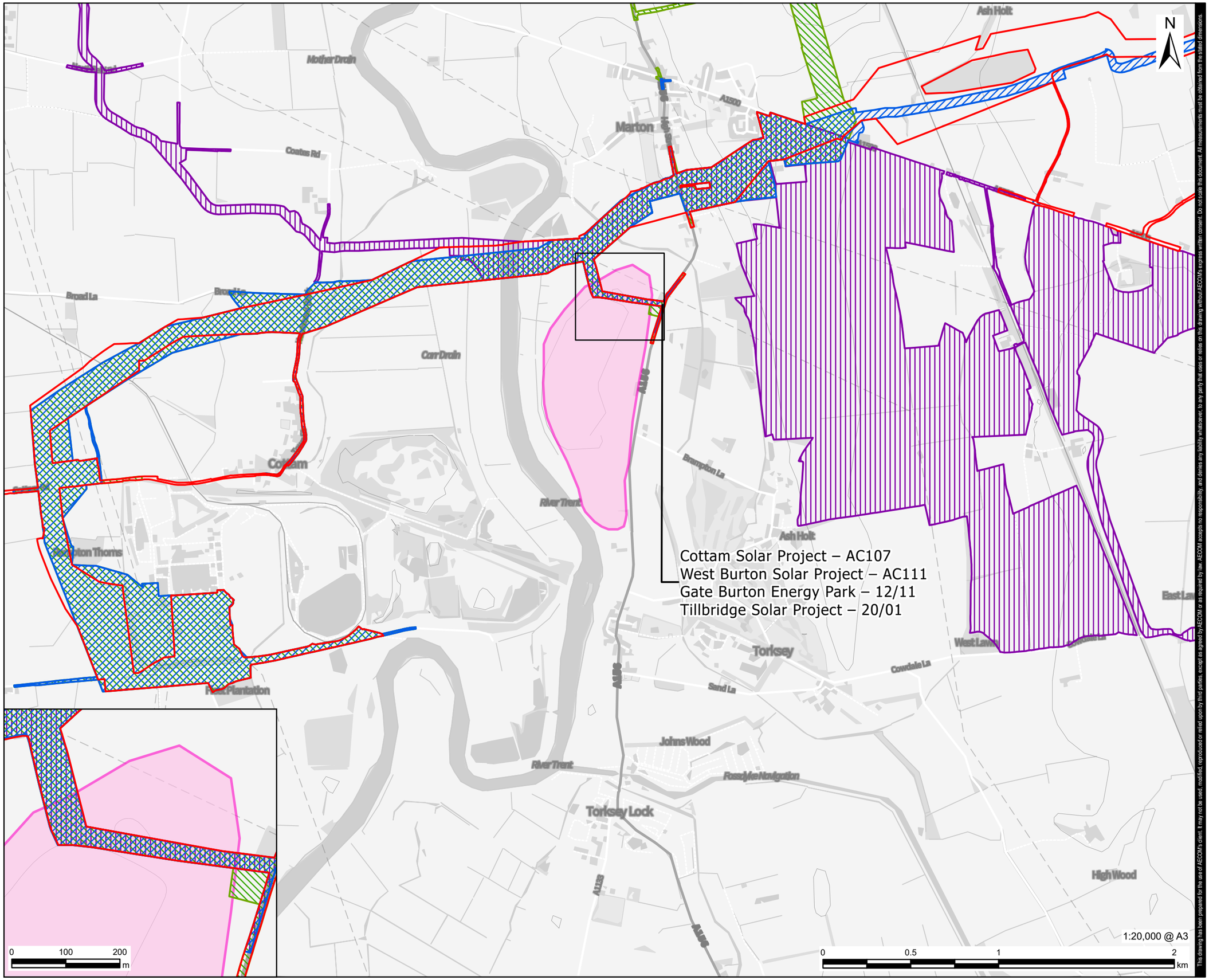

AECOM

PROJECT

Tillbridge Solar Project

CLIENT

Tillbridge Solar Ltd

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LEGEND

- Tillbridge Solar Order limits
- The Winter Camp of the Viking Great Army at Torksey (MLI125067)
- Cottam Solar Project
- Gate Burton Energy Park
- West Burton Solar Project

Access ID's have been taken from the following documents:

- Cottam Solar Project – Access Plan [REP4-007]
- West Burton Solar Project – Access Plan [REP5-091]
- Gate Burton Solar Project – Streets, Rights of Way and Access Plan [REP2-025]
- Tillbridge Solar Project – Streets, Rights of Way and Access Plan [AS-042]

NOTES

ISSUE PURPOSE

ExQ3

PROJECT NUMBER

60682158

FIGURE TITLE

Location of the Winter Camp of the Viking Great Army at Torksey (MLI125067)

FIGURE NUMBER

Figure 1

Tillbridge Solar

Tillbridge Solar Project

EN010142

Appendix B – Breakdown of land type by area within 5 mile radius of the Principal Site

Document Reference: EN010142/APP/9.40

Planning Act 2008
The Infrastructure Planning (Examination Procedure) Regulations 2010

April 2025
Revision Number: 00

Revision: 0 Drawn: LL Checked: HW Approved: CR Date: 2025-03-20

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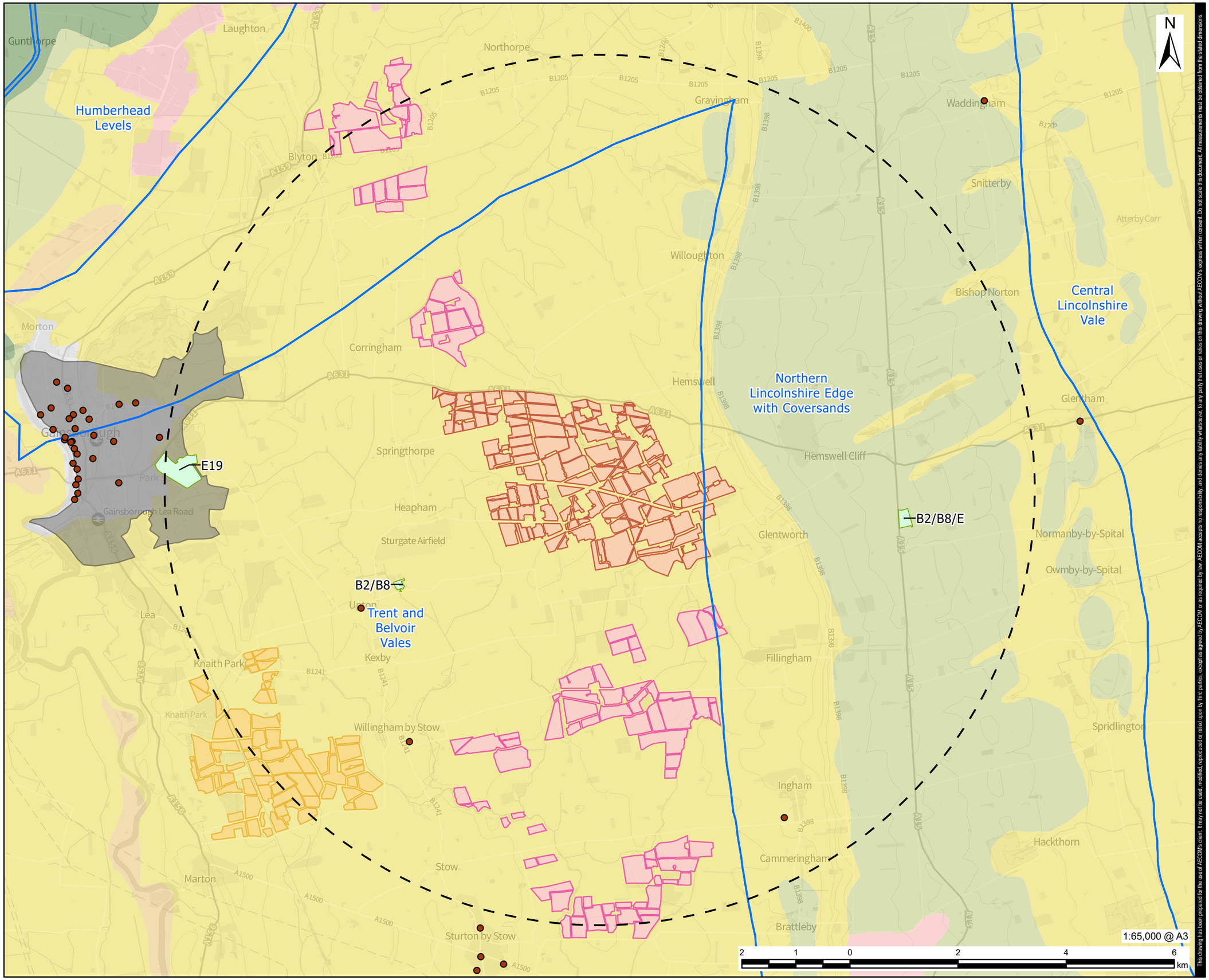

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LEGEND

- Tillbridge Solar Project
- Cottam Solar Project
- Gate Burton Energy Park
- Tillbridge Solar Project Order limits Centroid - 5 Mile Buffer
- Brownfield Site
- National Landscape Character Area
- Industrial Land
- Urban Area

Natural England's Provisional Agricultural Land Classification

- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Non Agricultural
- Urban

NOTES

ISSUE PURPOSE

DCO Submission

PROJECT NUMBER

60682158

FIGURE TITLE

Applicants Response to ExQ3.12.2 - Breakdown of land type by area within 5 mile radius of the Principal Site

FIGURE NUMBER

Appendix B - Applicants Response to ExQ3.12.2

Table 1: Applicants Response to ExQ3.12.2 - Breakdown of land type by area within 5 mile radius of the Principal Site

Land Classification and Scheme	Planning Inspectorate Reference	Hectares	Development Status	Percentage %
Area of Urban Land				
Total Area of Urban Land (Gainsborough) within 5-mile radius of Principal Site		**244.96**		**1.20%**
Area of Industrial Land				
Total Area of Industrial Land within 5 mile radius of Principal Site		**36.81**		**0.18**
Area of Brownfield Land / Previously Developed Land (PDL)				
Total Area of Brownfield Land / PDL within 5 mile radius of Principal Site		**2.27**		**0.01**
Area of Contaminated Land				

Land Classification and Scheme	Planning Inspectorate Reference	Hectares	Development Status	Percentage %
Total Area of Contaminated Land within 5 mile radius of Principal Site		**0**		**0**
Area of Rural Land				
Total Area of Rural Land within 5 Mile radius of Principal Site		**18274.46**		**89.8**
Area of Solar PV				
Cottam Solar Project	EN010133	798.71	Development consent granted	
Gate Burton Energy Park	EN010131	244.61	Development consent granted	
Tillbridge Solar Project	EN010142	739.56	Examination	
Total Area of Solar PV within 5-mile radius of the Principal Site		**1782.88**		**8.76**
Total		**20341.38**		