

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

**Response to The Examining Authority's written questions and requests for
information (ExQ3) issued on 11th March 2025**

Prepared by Lincolnshire County Council (LCC)

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The following table sets out the Council's response to the Examining Authority's (ExA's) written questions and requests for information (ExQ2) where a response from the County Council was sought.

ExQ3	Question	LCC Response
Q1.	General and cross-topic questions	
3.1.1	<p>Planning Balance in SoCGs</p> <p>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.</p> <p>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.</p>	<p>The Council believe that it has set out clearly in the SOCG its position in relation to each of the topics where this is disagreement between the Council and the applicant and the appropriate weight that should be afforded to its position within the planning balance.</p>
3.1.2	<p>SoCG</p> <p>Please ensure that all final SoCGs are signed by the parties to them. Please also ensure that they clearly</p>	<p>This has been completed and signed by LCC</p>

ExQ3	Question	LCC Response
	express any matters not agreed (i.e. outstanding matters in dispute) between parties to each SoCG.	
2.	Biodiversity and Ecology	
3.2.3	<p>Bat roosting, foraging and commuter sites</p> <p>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?</p> <p>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</p>	No comment from LCC
3.2.4	<p>Biodiversity Net Gain</p> <p>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.</p>	No comment from LCC
7.	Heritage	
Archaeology		
3.7.1	Viking Winter Camp	This matter will be included in the SoCG.

ExQ3	Question	LCC Response
	<p>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.</p>	<p>The Applicant maintains their position. The Applicant's assessment is based on the information available but archaeology always has the potential for unexpected discoveries, which is true of any development. There are however measures in place to deal unexpected discoveries in a manner appropriate to their significance.</p> <p>LCC also maintains their position that there is potential for significant archaeology to be found however we are content that the measures in place would appropriately mitigate the potential developmental impact.</p> <p>The Applicant and LCC have discussed the matter and understand each other's viewpoints and both agree that appropriate mitigation measures are in place to respond to unexpected discoveries.</p>
8.	Human health, safety, accidents and major incidents	
3.8.1	<p>Firefighting provisions</p> <p>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 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.</p>	<p>Access, egress and continued use of the local highways to support an operational incident continues to be an area of focus for LFR.</p> <p>Further engagement with the developers has allowed LFR to outline the requirements in relation to the suitable provision of alternative access points to the site, and an appropriate road network to allow passing and turning in and around the BESS enclosures.</p> <p>Updated plans will be required and agreed, but all points have been discussed and agreed with the developer.</p>

ExQ3	Question	LCC Response
3.8.2	<p>Community Warnings</p> <p>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.</p>	<p>Where managing an incident and there is a potential impact to the local community, LFR would look to share informative messages through their social media accounts. Where there was a need, messages would be simple and may suggest residents keep indoors and keep doors and windows closed.</p> <p>Where an incident is declared as a major incident, multi-agency plans would be developed, with safety messaging a part of the response and management.</p>
9.	Landscape and Visual impact	
3.9.4	<p>Visual effects</p> <p>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.</p> <p>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</p>	<p>Based on the applicant's LVIA methodology (Appendix 12-2: LVIA Methodology; Document Reference: EN010142/APP/6.2), and baseline assessment, our judgement for the three identified viewpoints is as follows:</p> <p>Viewpoints 2b: The Sensitivity of viewpoints (or receptors represented by this view) at all phases is judged by the LVIA author as being Medium (pg 8 of Appendix 12-6). LCCs position is that the residual (yr 15) Magnitude of Change from receptors at this viewpoint is aligned with a judgement of Medium. Therefore, based on Table 1-9: Classification of Effects Matrix within Appendix 12-2:</p> <p style="text-align: center;">Medium Sensitivity x Medium Magnitude of Change</p>

ExQ3	Question	LCC Response
	<p>which is 'high' during construction and year 1 of operation. LCC considers 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.</p> <p>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'?</p>	<p>= Moderate Level of Effect = Residual <u>Significant</u> Effect for Viewpoint 2b</p> <p>Viewpoint 4: The Sensitivity of viewpoint (or receptors represented by this view) at all phases is judged by the LVIA author as being Medium (pg13 of Appendix 12-6). LCCs position is that the residual (yr 15) Magnitude of Change from receptors at this viewpoint is aligned with a judgement of Medium. Therefore, based on <i>Table 1-9: Classification of Effects Matrix</i> within <i>Appendix 12-2</i>:</p> <p>Medium Sensitivity x Medium Magnitude of Change = Moderate Level of Effect = Residual <u>Significant</u> Effect for Viewpoint 4</p> <p>Viewpoint 20: The Sensitivity of viewpoints (or receptors represented by this view) at all phases is judged by the LVIA author as being Low (pg 51 of Appendix 12-6). LCCs position is that the residual (yr 15) Magnitude of Change from receptors at this viewpoint is aligned with a judgement of Medium. Therefore, based on <i>Table 1-9: Classification of Effects Matrix</i> within <i>Appendix 12-2</i>:</p> <p>Low Sensitivity X Medium Magnitude of Change</p>

ExQ3	Question	LCC Response
		<p>=</p> <p>Minor Level of Effect</p> <p>=</p> <p>Residual <u>Not Significant</u> Effect for Viewpoint 20</p>
13.	Transport and access	
3.13.2	<p>ATC23</p> <p>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]?</p>	LCC agree that with the mitigation proposed in the CTMP the impact on highway safety and capacity is acceptable in accordance with NPPF Paragraph 116.
14.	Water environment including flood risk	
3.14.1	<p>Water storage for firefighting purposes</p> <p>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 supplies might be maintained during any ongoing fire fighting incident.</p>	LFR have confirmed requirements for minimum water provision. Consideration should then be given to capturing water run-off and the possibility of recycling fire fighting water. These provisions will need to be confirmed as part of the updated plans.