Nationally Significant Infrastructure Project

Springwell Solar Farm Project

Lincolnshire County Council Local Impact Report – June 2025

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1. Terms of Reference

Introduction

1.1 This report is the Local Impact Report (LIR) for Lincolnshire County Council (the Council). In preparing this LIR regard has been made to the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended), DCLG's Guidance for the examination of applications for development consent, the Planning Inspectorate's Advice Note One: Local Impact Reports, as well as the Planning Inspectorate's 'Example Documents'.

Scope

1.2 This LIR relates to the impacts of the proposed development of Springwell Energy Farm solar project as it affects the administrative area of the Council.

1.3 This is the Local Impact Report (LIR) of the Council one of the host authorities for the Project. Section 104 of the Planning Act 2008 (the 'Act') requires the Secretary of State to have regard to LIR's in deciding applications. The Act defines an LIR as "a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)" (section 60(3)).

1.4 Provided that the LIR fits within this definition, its structure and content is a matter for the Local Authority. However, guidance is provided in the Planning Inspectorate's Advice Note One: LIR's (version 2, April 2012), which states that the LIR should set out the local authority's view of likely positive, neutral and negative local impacts, and give its view on the relative importance of different social, environment or economic issues and the impact of the scheme upon them.

1.5 This LIR has, therefore, been prepared in accordance with section 60(3) of the Planning Act 2008 (as amended) and having regard to the guidance in the Planning Inspectorate's Advice Note. Accordingly, it seeks to assist the Examining Authority (ExA) by presenting the Council's assessment of the likely impacts of the Project. Based on local information, expert judgement, and evidence.

1.6 This LIR appraises the impacts likely to result from the Project and identifies whether the impacts are considered to be negative, positive or neutral, taking into account proposed mitigation measures. It also considers whether further work should be undertaken, including mitigation, to address negative issues identified, and raises any missed opportunities for enhancement measures.

1.7 This LIR appraises the DCO documents submitted by the Applicant at the submission stage. Any further submissions will be addressed through subsequent written evidence through the Examination process.

1.8 The topic areas covered in the LIR are set out in section 2 below. The topics covered do not reflect the full remit of those addressed in the Environmental Impact

Assessment (EIA) but highlight what are considered by the Council to be the key issues within their remit.

1.9 The Council is the upper-tier local authority for the county of Lincolnshire as a whole and has a range of statutory responsibilities to provide services and discharge regulatory functions, which together affect a great many aspects of the built, natural, and social environment. These functions include acting as Local Highway Authority, Local Transport Authority, Waste Planning Authority, Waste Disposal Authority, Minerals Planning Authority, County Planning Authority, Lead Local Flood Authority, Fire Authority, Public Health Authority, Local Education Authority, and Social Services Authority.

1.10 The Council also holds responsibility for maintaining the Definitive Map and the Historic Environment Record.

1.11 This LIR does not reflect the views of North Kesteven District Council (NKDC). In producing this LIR, the Council has not sought the views of the public or local interest groups as to any particular matters that should be reflected in the LIR.

1.12 The Council has experience of the Nationally Significant Infrastructure Project (NSIP) planning regime. The Council is a host authority for the number of projects that have been consented or at recommendation stage including Boston Alternative Energy Facility, Mallard Pass, Gate Burton, Cottam, West Burton, Heckington Fen solar schemes and Viking Carbon Capture Storage scheme.

2. Purpose of the LIR

2.1 The LIR Covers topics where the Council has a statutory function or holds expertise. The Council defers to NKDC on all other matters.

2.2 The LIR is structured by first identifying the relevant national and local policies, secondly identifying the local impacts, and lastly addresses the extent to which the development proposals accord with these policies. For each topic area, the key issues are identified on the extent the applicant addresses these issues by reference to the application documentation, including the draft DCO articles, requirements and obligation, where relevant.

2.3 This LIR does not seek to duplicate material covered in the Statement of Common Ground (SoCG) which will be progressed through the Examination stage.

3. Overview of the proposed Development

3.1 A full description of the proposed development and various ancillary structures themselves is not detailed within this report as this is set out in the DCO application documents.

3.2 The scheme would comprise the construction, operation maintenance and decommissioning of ground mounted solar photovoltaic (PV) generating modules, battery storage facilities, and grid connection infrastructure. At total capacity, the Solar Farm would generate over 800MW electrical output capacity to the National Grid network, and the scheme overall would have an anticipated operational life of 40 years. The development would also include landscaping, habitat management, biodiversity enhancement and amenity improvements, alongside works to facilitate vehicular access to the site.

3.3 The land within the Order Limits is within the administrative boundaries of the Council and NKDC, who will both act as host authorities for the development. The scheme has two distinct elements:

- The Principal Site – which consists of three distinct parcels: Springwell West, Springwell Central, and Springwell East. These three parcels cover an area of approximately 1,280 hectares (ha) and is the location where ground mounted solar PV panels, electrical sub-station, a Battery Energy Storage System (BESS) and other associated infrastructure would be installed.

- The Cable Route Corridor – would comprise of a 400kV underground cable corridor, on land located north of Heath Lane, Navenby. The Grid Connection Corridor would connect the Springwell substation to the proposed new National Grid Navenby substation.

3.4 The Springwell substation would be connected to the PV arrays and battery storage via distribution cables. Underground cabling would connect the substation into the National Electricity Transmission System via a 400kV grid connection cable route. The substation and cable connections would be required for the duration of the scheme.

3.5 Springwell has a grid connection agreement with National Grid, which would allow 800MW of electricity to this network, through a new substation that would be developed, owned and operated by National Grid. There would also be capacity to import power from the network. This substation would be developed separately by National Grid and is not part of the Springwell proposals and does not form part of this DCO application. National Grid propose to submit a separate application under the Town and Country Planning Act 1990, as amended to NKDC.

4. Description of the Site and Surrounding Areas

4.1 The Site covers 1,280ha contains 3 distinct parcels: Springwell West, Central and East all on predominantly agricultural land. The site falls within the Southern Lincolnshire Edge National Character Area defined by the limestone cliff to the west and the dip slope that drops gently away to the edge of the fens in the east. On the free-draining higher ground, landcover is primarily arable.

4.2 **Springwell West**

4.2.1 Springwell West is the southernmost parcel of the Site, intersected by the A15 Sleaford Road running north to south, with a 25m buffer maintained along the A15. The area features an open agricultural landscape and borders Bloxham Wood Nature Reserve in the southeast. The land comprises Grade 2 and 3 agricultural classifications, with minor encroachment onto non-agricultural land.

4.2.2 Key rivers include Springwell Brook/Digby Beck and New Cut Drain, alongside field drains and ditches. Springwell Brook, managed by the Environment Agency, flows eastward through Springwell West, extending from Bloxham to Dorrington Dike. A Source Protection Zone (SPZ 3) covers the southern extent of the parcel.

4.2.3 Brauncewell Medieval Village Scheduled Monument is immediately adjacent to the south of Springwell West with Dunsby Medieval Village Scheduled Monument circa 1km from the southernmost extent of Springwell West. A Grade II listed Mile Post building south of Ashby Lodge Farm on the A15 also falls within the DCO extent.

4.2.4 The Agricultural Land Classification maps in Appendix C shows that Springwell West predominantly comprises Grade 3a and 3b land with pockets of Grade 2 land.

4.3 **Springwell Central**

4.3.1 Springwell Central lies at the heart of the site, and skirts to the north of Scopwick and east of RAF Digby linking Springwell West and East. It is bordered by RAF Digby to the north and the B1191 to the West, Ashby de la Launde to the south, and open agricultural fields to the south and east.

4.3.2 The land comprises predominantly Grade 3a and 3b agricultural classifications with a small presence of Grade 2 and Grade 4 land.

4.4 **Springwell East**

4.4.1 Springwell East, the northernmost and easternmost section of the Site, is bordered by Scopwick to the south, Kirkby Green to the southeast, Blankney to the north, the B1188 to the west, and the Peterborough-Lincoln railway line to the east. The B1191 to the south provides direct access to RAF Digby, Scopwick, and nearby villages.

4.4.2 The area features small woodland plantations, hedgerows, and the New Cut Drain to the south and west of Kirkby Green. Most of the site lies within Flood Zone 1, with some fields in the northeast falling within Flood Zones 2 and 3.

4.4.3 The parcel consists of predominantly Grade 3a and Grade 3b agricultural land but with a significant areas of Grade 2 land and a pocket of Grade 1 land found in the east of the site. Eighteen Public Rights of Way (PRoW) intersect or lie within the Site, including four promoted walks from NKDC's 'Stepping Out' series: Spires and Steeples Trail, Scopwick Loop, Kirkby Green Loop, and Blankney Circuit. A 15m buffer

is proposed to ensure solar panels do not obstruct views along footpaths, and panels would be set back from residential properties to minimise visual impact.

4.4.4 The site is free from statutory landscape or ecological designations. The Lincolnshire Wolds National Landscape, an Area of Outstanding Natural Beauty (AONB) is 23km to the northeast, and The Wash and North Norfolk Coast Special Area of Conservation (SAC) is 35km to the east. Seven Local Wildlife Sites (LWS) are within or adjacent to the Site boundary.

4.4.5 There is no ancient woodland within the boundary, but Long Wood ancient woodland lies 500m west of Springwell East. Small woodland plantations within the Site include Keeper's Covert, Toll Bar Plantation and Brickyard Plantation with Catton's Holt being immediately contiguous with the Site boundary and Ash Holt surrounded on three sides by the Site.

4.4.6 Metheringham Heath Quarry Site of Special Scientific Interest (SSSI), designated for Lincolnshire Limestone, is 2km north of Springwell East.

4.4.7 Blakney Conservation Area is immediately to the north of Springwell East, with Scopwick Green Conservation Area immediately to the south of the proposed development.

4.5 Additional heritage features include 360 non-designated heritage assets within 2km of the study area, and 263 listed buildings within the wider study (5km) area: 13 Grade I, 13 Grade II* and 237 Grade II listed buildings. Additionally, 11 conservation areas are situated within 5km of the site.

4.6 The Site largely falls outside Source Protection Zones, except for a small area west of Scopwick within SPZ 1, which protects a local groundwater abstraction source. There are no outer catchments associated with this SPZ.

5. Policy Context

National Planning Policy

5.1 The Secretary of State (SoS) is required to have regard to any relevant national policy statement (NPS), amongst other matters, when deciding whether to grant a DCO. Where there is a relevant NPS in place DCO applications are determined in line with Section 104 of the PA2008. However, where there is no relevant NPS in place then Section 105 of the PA2008 takes effect and provides the legal basis for determining DCO applications. In addition to any relevant NPS, Section 104 requires the SoS to also have regard to any LIR and any matters which the SoS thinks are both important and relevant to its decision.

5.2 The following NPS's (dated November 2023) that came into force 17 January 2024 are considered relevant to the determination of this DCO application:

5.3 **EN-1 - Overarching National Policy Statement for Energy**
EN-1 (Overarching National Policy Statement for Energy) confirms the Government's 2050 net zero ambitions. It also identifies the need to ensure the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon energy. Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Renewable energy generation such as solar is considered to be CNP infrastructure.

5.4 **EN-3 – National Policy Statement for renewable energy infrastructure**
Solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector and that the government expects a five-fold increase in solar deployment by 2035 (up to 70GW). It is also stated that solar farms can be built quickly and – coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels – large-scale solar is now viable in some cases to deploy subsidy-free.

5.5 This NPS sets out key considerations and factors that will need to be taken into consideration when selecting sites and these include irradiance and site topography, proximity of site to dwellings, agricultural land classification and land type, accessibility, public rights of way, security and lighting and grid connectivity. The technical considerations are set out in and include capacity of the site, site layout design and appearance, project lifetimes and flexibility. Impacts that will need to be considered are set out and include biodiversity, ecology, geological conservation, water management, landscape, visual and residential amenity, glint and glare, cultural heritage, construction including traffic and transport noise and vibration.

5.6 **EN-5 – National Policy Statement for Electricity Networks Infrastructure**
EN-5 is also relevant as it recognises electricity networks as "transmission systems (the long-distance transfer of electricity through 400kV and 275kV lines), and distribution systems (lower voltage lines from 132kV to 230V from transmission substations to the end-user) which can either be carried on towers/poles or undergrounded" and "associated infrastructure, e.g. substations (the essential link between generation, transmission, and the distribution systems that also allows circuits to be switched, or voltage transformed to a useable level for the consumer) and converter stations to convert DC power to AC power and vice versa." This is therefore relevant in so far as it relates to the proposed grid connection.

5.7 On 24 April 2025 the Government published a consultation on revisions to EN-1, EN-3 and EN-5. Whilst the review is undertaken, the current suite of energy NPS's remain relevant and have effect for the purposes of the Planning Act 2008.

5.8 The National Planning Policy Framework (NPPF) was first published in 2012 and updated in 2018, 2019, 2021, 2023 and 2024. Paragraph 5 of the NPPF states that the document does not contain specific policies for NSIPs. NSIPs are to be determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs which form part of the overall framework of

national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.

5.9 The new Labour government elected in 2024 aims to re-instate mandatory housing targets and local authorities to have a 5-year land supply for housing. They have removed the idea of 'beauty', have updated the 'presumption in favour' of sustainable development and have redefined the classification of areas of Green Belts to include 'grey belt'.

5.10 The NPPF does, however, state that the planning system should support the transition to a low carbon future and support renewable energy and associated infrastructure (paragraph 152) and that local planning authorities should, when determining planning applications for such development, approve the application if its impacts are (or can be made) acceptable. Applicants are not required to demonstrate the overall need for renewable or low carbon energy (paragraph 158(a)).

5.11 The National Planning Policy Guidance (NPPG) outlines guidance on the specific planning considerations that relate to large scale ground-mounted solar PV farms. It encourages the effective use of previously developed land, and if a proposal does involve greenfield land, that it allows for continued agricultural use and/or encourages biodiversity improvements around arrays. It also states that local authorities should consider the effect of glint and glare on landscape, on neighbouring uses and aircraft safety in addition to taking great care to ensure heritage assets are conserved in a manner appropriate to their significance.

5.12 The potential impacts of large-scale solar farms were also addressed through a speech by the then Minister for Energy and Climate Change to the solar PV industry on 25 April 2013 and subsequent Written Ministerial Statements (WMS). The speech highlighted the importance of considering the use of low grade agricultural land which works with farmers to allow grazing in parallel with generation, and the WMS (dated 25/3/15 - UIN HCWS488) stressed that meeting our energy goals should not be used to justify the unnecessary use of high quality agricultural land, noting that 'any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence'.

5.13 On 15 May 2024, a WMS was published on solar infrastructure and protecting food security and Best and Most Versatile (BMV) land. The Council notes that the 15 May 2024 WMS captures elements of the 2024 NPS's. In particular, the 2024 WMS emphasises that when considering whether planning consent should be granted for solar development the cumulative impacts where several proposals come forward in the same locality should be considered.

5.14 Notwithstanding, the NPSs provide the predominant policy context.

Development Plan

5.15 For the purpose of Section 38(3) of the Planning and Compulsory Purchase Act 2004, the relevant documents that comprise the development plan in force in the area and of relevance to the DCO application are set out below. Other policy documents that should be considered as a material considerations are also identified.

Central Lincolnshire Local Plan

5.16 The Central Lincolnshire Local Plan 2023-2043 (CLLP) was adopted April 2023., replacing the Central Lincolnshire Local Plan adopted in 2017.
The relevant policies are:

- **Policy S1: The Spatial Strategy and Settlement Hierarchy** – Reason: The development would be located in the countryside.

- **Policy S5: Development in the Countryside –** Specifically Part E: Non-Residential development in the country. The reason for this is because of the criterion to be considered that *"The development is of a size and scale commensurate with the proposed use and with the rural character of the location."*

- **Policy S12: Water Efficiency and Sustainable Water Management** – Reason: To encourage infiltration, as Central Lincolnshire is identified as being within an area of serious water stress and to reduce energy demand on the water recycling network.

- **Policy S14: Renewable Energy –** Reason: To consider if the impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their settings, and the historic landscape; and highway safety and rail safety.

- **Policy S16: Wider Energy Infrastructure** - recognises and supports, in principle, the need for significant investment in new and upgraded energy infrastructure the transition to net zero taking subject to mitigation, appropriate locations and good design to minimise harm.

- **Policy S21: Flood Risk and Water Resources –** Reason: some of the site is in high flood risk zones.

- **Policy S47: Accessibility and transport –** Reason: the development involves traffic on the highway network.

- **Policy S48: Walking and Cycling Infrastructure** - Reason: to protect, maintain and improve existing infrastructure, including closing gaps or deficiencies in the network and connecting communities and facilities; this being relevant to the PRoWs.

- **Policy S53: Design and Amenity –** Reason: all development, including extensions and alterations to existing buildings, must achieve high quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all.

- **Policy S54: Health and Wellbeing –** Reason: This policy aims to ensure adequate access to nature, which might run counter to the development essentially "taking away" open green space.

- **Policy S57: The Historic Environment –** Reason: to protect heritage assets, above and below ground and on the site.

- **Policy S59: Green and Blue Infrastructure Network –** Reason: relevant because of the nature of the development itself or the development impacts on PRoWs.

- **Policy S60: Protecting Biodiversity and Geodiversity** – Reason: Due to the need to ensure that adverse impacts of development are adequately mitigated.

- **Policy S61: Biodiversity Opportunity and Delivering Measurable Net gains –** Reason: delivering at least a 10% biodiversity net gain is an ambition that all DCO projects are working towards as it will become mandatory for projects of this size to be comply with biodiversity net gain (BNG) targets in 2025.

- **Policy S62: Area of Outstanding Natural Beauty and Areas of great Landscape Value –** Reason: relevant because of the cumulative impacts on landscape and visual impacts.

- **Policy S66: Trees, Woodland and Hedgerows –** Reason: due to the trees and hedgerows within and around the site boundaries and the potential for a proportion of these to be removed to enable the development to progress.

- **Policy S67: Best and Most Versatile Agricultural Land –** Reason: there is BMV land present on all three parts of the site and in the cable route corridor.

- **Policy S84: Ministry of Defence Establishments –** Reason: Due to the close proximity to MOD sites.

Scopwick and Kirkby Green Neighbourhood Plan (2021-2036) (SKGNP)

5.17 The Scopwick and Kirkby Green Neighbourhood Plan was adopted in 2021 and formally made part of NKDC's Development plan in March 2023. Springwell's order limits fall within the area of this plan.

The relevant policies are:

- **Policy 2: Protecting the Landscape Character –** Reason: Areas identified as Significant Green Gaps (maps 3a and 3b within the plan) will not be granted

planning permission for development that adversely affects the sense of openness or their undeveloped character.

- **Policy 3: Protecting and Enhancing Biodiversity** – Reason: Delivering at least a 10% biodiversity net gain is an ambition that all DCO projects are working towards as it will become mandatory for projects of this size to be comply with biodiversity net gain targets in 2025.

- **Policy 5: Conservation and Enhancement of Non-Vehicular Routes** – Reason: Development proposals will be expected to demonstrate how they protect and where possible enhance existing PRoW and permissive routes.

- **Policy 6: Achieving High Quality Design** – Reason: Development proposals should reinforce the character of the area.

- **Policy 8**: **Enhancing the Provision of Community Facilities** – Reason: to ensure the provision of adequate community space (indoor and outdoor) for a range of community activities to foster social cohesion and contribute to sustainable development.

- **Policy 10: Protecting Heritage Assets** – Reason: There are non-designated heritage assets and conservation areas near the site.

5.18 **Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (2016) (LMWLP):**

- **Policy DM1: Presumption in favour of sustainable development –** Reason: the County Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.

- **Policy DM4: Historic Environment** – Reason: potential archaeological interest.

- **Policy DM12: Best and Most Versatile Agricultural Land** – Reason: development proposals that involve significant amounts of BMV agricultural land will only be permitted where the stated criteria are met.

- **Policy M11: Safeguarding of Mineral Resources** – Reason: Springwell is located in a Sand and Gravel Minerals Safeguarding Area (MSA).

- **Policy M12: Safeguarding of Existing Mineral Sites and Associated Minerals Infrastructure.** There is safeguarded mineral sites in close proximity to the Springwell site that could be impacted by the development.

- **Policy W1:** Future Requirements for New waste Facilities.

5.19 **North Kesteven Strategic Flood Risk Assessment – 2009 Revision Report**

The SFRA has assessed the flood risk issues at a strategic scale to inform the spatial planning process.

5.20 **Lincolnshire County Council Energy Infrastructure Position Statement (December 2023)**

5.20.1 The Council's Energy Infrastructure Position Statement[1] notes that NSIP's cover a range of potential developments including solar farms and cable routes.

5.20.2 All new energy sources need to be connected to the grid and this creates risk. The Council's position is that any cabling required should be underground unless connecting to an existing overhead line.

5.20.3 The statement notes the advice contained in the NPPF that local planning authorities should consider the economic and other benefits of BMV agricultural land. Where significant development of agricultural land is demonstrated to be necessary local planning authorities should require the use of areas of poorer quality land in preference to that of higher quality. Based on this the Council will object to development on Grade 1, 2 and 3a land.

5.20.4 In considering NSIP proposals the protection of BMV agricultural land is the starting point for the Council for projects that involve significant land take. This principle will be cross referenced with other topics of consideration such as local environment, landscape, historic and community impacts to come to a view if there is any justification to override the loss of agricultural land.

5.20.5 Finally, consideration should be given to the cumulative impact from proposals in combination for significant impact of numerous developments clustered within the same locality in a similar time period.

5.21 **North Kesteven Climate Emergency Strategy and Action Plan, 2020 (updated 2022)** This strategy outlines North Kesteven District Council's strategy to reach net zero emissions by 2030.

6. Assessment of Impacts and Adequacy of Response

6.1 The following sections identify, for each topic heading listed below, key statements from national planning policy, the relevant local planning policies, the key issues and impacts raised by the proposed development and the extent to which the applicant has addressed these issues in the application documents.

- Principle of the Development – Climate Change
- Grid Connection

[1] Energy Infrastructure Position (December 2023)

- Landscape and Visual
- Ecology
- Traffic and Transport
- Public Rights of Way (PRoW)
- Flood Risk, Drainage and Surface Water
- Minerals and Waste
- Cultural Heritage (Built Heritage and Archaeology)
- Land, Soil and Groundwater
- Socioeconomics
- Public Health
- Minerals and Waste
- Cumulative Effects
- Fire Safety
- Other topics
- Draft DCO

7. The Principle of the Development – Climate Change

7.1 The overarching energy NPS EN-1 sets out the overarching needs case for different types of energy infrastructure and general assessment principles. EN-1 re-affirms the government's commitment to net zero and sets out that the government's objectives for the energy system to ensure energy supply remains secure, reliable, affordable, and is consistent with meeting the UK net zero target by 2050.

7.2 Section 3.2 of EN-1 requires the SoS, in decision making, to assess all applications for development of the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of development which is urgent. The government has concluded that there is a critical national priority for the provision of nationally significant low carbon infrastructure for both energy security and net zero.

7.3 Section 4.10 of EN-1 addresses climate change adaptation and resilience in energy infrastructure development. It requires the effects of climate change to be considered when developing and consenting infrastructure, referring also to the potential long-term impact of climate change.

7.4 New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure (paragraph 4.10.8).

7.5 The SoS should be satisfied that applicants for new energy infrastructure have considered the potential impacts of climate change using the latest UK Climate Projections available at the time the ES was prepared to ensure they have identified

appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure (paragraph 4.10.13).

7.6 EN-1 notes that we must continue to accelerate efforts to end our contribution to climate change by reaching net zero GHG emissions. It also emphasis the need for adaptation, which is necessary to manage the impacts of current and future climate change.

7.7 Paragraph 2.3.5 of EN-1 notes that historically the UK energy system has been dominated by fossil fuels. Paragraph 2.3.6 acknowledges the need to transform the energy system, tackling emissions whilst continuing to ensure secure and reliable supply.

7.8 Local Policies:

- CLLP Policy S14: Renewable Energy
- CLLP Policy S16: Wider Energy Infrastructure
- CLLP Policy S53: Design and Amenity
- LMWLP Policy DM1: Presumption in favour of sustainable development.

7.9 CLLP Policy S14 (Renewable Energy) states that proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect, individual, and cumulative impacts of development on a number of considerations are, or will be made, acceptable.

7.10 Paragraph 3.3.4 of the supporting text to policy S14 sets out that the aim of the Joint Committee that prepared the CLLP is to maximise appropriately located renewable energy generated in Central Lincolnshire. Policy S14 sets no floor or cap on the scale of renewable energy targeted to be generated, preferring, instead, an approach which supports all appropriate proposals that meet the policy requirements set out.

7.11 Paragraph 3.3.19 recognises that in order to support a move to a zero carbon Central Lincolnshire, there is a need to move away from fossil fuels (gas, petrol, diesel, oil) towards low carbon alternatives and this transition needs to take place with increasing momentum in order to stay within identified carbon saving targets. Demand for electrical energy is forecast to increase by 165% in Central Lincolnshire over the next 30 years and so electrical infrastructure will need to adapt and change to accommodate this increased need for the management and storage of electricity. Energy storage (including battery storage), consideration of existing and new electricity substation, and energy strategies for large developments are required to help support the future energy infrastructure needs for Central Lincolnshire.

7.12 CLLP Policy S16 (Wider Energy Infrastructure) states that the Joint Committee is committed to supporting the transition to a net zero carbon future and, in doing so, recognises and supports, in principle, the need for significant investment in new and upgraded energy infrastructure. Support will be given to proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region, which

could include energy storage facilities and upgraded or new electricity facilities or other electricity infrastructure. This policy however caveats that any such proposals should take all reasonable opportunities to mitigate any harm arising from such proposals and take care to select not only appropriate locations for such facilities but also design solutions (reference to policy S53) which minimises harm arising.

7.13 The theme of these policies centres around the desire to support developments that are sustainable/relate to renewable energy. The principle of this development is meeting a nation need for solar/renewable energy, so it should be assessed against these policies. Policy S14 requires the specific tests to be met:

- The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their settings and the historic landscape; and highway safety and rail safety; and

- The impacts are acceptable on aviation and defence navigation system/ communications; and

- The impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic.

7.14 The Springwell Solar Project would make a significant contribution towards renewable energy generation, generating 800MW of energy. This contribution aligns with the NPS's and to key commitments of government at the national level to reach net zero by 2050. The Council recognises, in principle, that solar energy development can help meet targets for reducing carbon emissions, reduce reliance on fossil fuels and provide local and national energy security. They can also provide economic diversification for farmers and landowners and support local employment opportunities during the construction phase and which may offset any impact on farming enterprises Therefore whilst the Springwell Solar Project, by its nature offers significant positive impacts in terms of the production of clean renewable energy and the transition and movements towards Net Zero, in order to be supported it must be demonstrated that there are no significant adverse environmental impacts that cannot be appropriately managed and/or mitigated through the DCO process. The Council's position is therefore that overall, adopting a 'whole life' approach to GHG emissions, that significant positive impacts would accrue. The Council does however raise some points of detail in respect of the applicant's assessment of GHG emission in relation to waste generation in Section 18 of this report.

7.15 The sections below consider the potential impacts of the development on other factors/topics. The Examining Authority (ExA) will need to balance these positive impacts against the negative impacts identified within this LIR and those raised by other host authorities and Interested Parties.

8. Grid Connection

8.1 The Council are of the view that a crucial aspect of this proposal is ensuring certainty about the grid connection. There is currently no existing grid connection available to the applicant for the Springwell Solar project and the development relies on connection to a new substation that is being promoted by National Grid at Navenby. The required infrastructure does not yet benefit from planning permission and is some years away from being completed. The applicant has received a grid connection offer from National Grid to connect to the proposed Navenby Substation. The new Navenby Substation does not form part of the DCO application and will be subject to planning permission through the Town and Country Planning Act 1990, as amended, for which a planning application is yet to be submitted. This presents potential concerns regarding the information available to inform the Environmental Statement (ES), the timing of the two related projects and the deliverability of the Springwell Solar project.

8.2 NPS EN1 paragraph 4.11.8 states that "*On some occasions it may not be possible to coordinate applications. For example, different elements of a project may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls) making it inefficient from a delivery perspective to submit one application. Applicants may therefore decide to submit separate applications for each element[160]. Where this is the case, the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused.*"

8.3 Footnote 160 of NPS EN-1 acknowledges that different levels of information may be available at different times and as such applicants should take a proportionate approach to what information should be included.

8.4 Paragraph 4.11.9 of NPS EN-1 advises that if this option is pursued, the applicant accepts the implicit risks involved in doing so and must ensure they provide sufficient information to comply with the EIA Regulations including the indirect, secondary, and cumulative effects, which will encompass information on grid connections.

8.5 The applicant has provided an assessment of inter-project effects and information in relation to greenhouse gas emission (GHG) in respect of the proposed National Grid Navenby Substation in Chapter 16: Cumulative Effects of the ES [APP-043]. The assessment is a high-level appraisal based on assumptions, using information on similar applications and National Grids factsheet on substation construction. Details are set out in paragraph 16.6.2 of the ES [APP-043]. The assessment covers air quality, biodiversity, cultural heritage, land, soil and groundwater, noise and vibration, population, traffic and transport, water, climate (greenhouse gas emissions), and landscape and visual. The SoS will need to be satisfied that a sufficient level of information is available for the Navenby substation and that a robust assessment of the inter-project effects has been undertaken in determining

this application in order to comply with the EIA regulations, and in accordance with paragraph 4.11.9 of EN-1. Further comments on cumulative impacts with this project and other projects is provided in section 19 of this report below.

8.6 Regarding the timings of the two project the ES [APP-043] indicates at paragraph 3.14.2 that the earliest date construction works could commence on the Springwell Solar scheme would be Q1 2027. The Grid Connection Statement [APP-0160] at paragraph 4.1.5 states that the construction phase, including the process of building the Springwell Substation and Grid Connection Route, would be commenced in Q3 2027. Paragraph 3.1.3 states that the grid connection agreement contains 2 stages of connection dates, with a 50:50 split of capacity between April 2028 and April 2030 connection dates. However, paragraph 4.4.3 states that the completion of the National Grid Navenby Substation would not be until late 2029.

8.7 On the (reasonable) assumption that the Springwell Solar development could not become operational until the Navenby substation is complete and in operation, indicated to be late 2029, the Council questions how the Springwell Solar development could connect from April 2028. Further clarity is therefore required on how the two projects would align, given the dates provided in the application. The applicant's oral submission at ISH1 concerning a change application submitted to National Grid about the connection dates has been noted. We are awaiting further details on this matter and anticipate that the application documents will be updated accordingly.

8.8 Certainty of a grid connection and therefore the deliverability of this project is a concern to the Council. There is a potential risk for negative environmental impacts to occur from the Springwell development commencing without the benefits of generation which would be relied upon for the grant of any consent being secured. Should the SoS be minded to grant the DCO, the Council are of the view that the DCO should make provision through a requirement to restrict the commencement of the Springwell development until a particular point has been reached with the Navenby Substation, which we consider should be more than a material start, so that it can be said with certainty that this necessary infrastructure will be delivered in line with the assumptions made in the ES. The Council would draw the SoS attention to requirement 33 of the Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order 2022 which imposes a restriction on commencement until an environmental permit is in place. Whilst this requirement relates to an environmental permit need it has similarities in that it was the case that negative environmental effects could occur if the control was not in place.

8.9 A further consideration is the effect on the validity of the ES should there be a slippage in timescales for the Springwell development due to not being able to connect to the grid by the connection dates indicated, for example, ecology surveys becoming out of date or overlaps with the construction phases of future projects which were not envisaged to be constructed at the same time as Springwell, due to optimistic assumptions within the ES not coming to fruition.

9. Landscape and Visual

9.1 NPS EN-1 at paragraph 5.10.37 states that the SoS should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.

9.2 Paragraph 5.10.35 of EN-1 states that the '*scale of energy projects means that they will often be visible across a very wide area*'. It goes on to stress that the SoS '*should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project'*. Paragraph 5.10.36 then sets out that the SoS should '*consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable*'.

9.3 Paragraph 5.10.5 of EN-1 states that '*virtual all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation'*.

9.4 Paragraph 5.10.6 then goes on to state that '*projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate'*.

9.5 The specific guidance relating to Solar Photovoltaic Generation in section 2.10 of EN-3 at paragraph 2.10.94 notes that 'Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure'. Paragraph 2.10.95 states that '*whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised*'.

9.6 Local Policies:

- CLLP Policy 1: The Spatial Strategy and Settlement Hierarchy
- CLLP Policy S5: Development in the Countryside
- CLLP Policy S14: Renewable Energy
- CLLP Policy S53: Design and Amenity
- CLLP Policy S62: Area of Outstanding Natural Beauty and Areas of Great Landscape Value
- CLLP Policy S66: Trees, Woodland and Hedgerows
- SKGNP Policy 2: Protecting the Landscape Character
- SKGNP Policy 6: Achieving High Quality Design

9.7 CLLP Policy 1 (The Spatial Strategy and Settlement Hierarchy) focuses on delivering sustainable growth for Central Lincolnshire to meet the needs for homes and jobs, regenerates places and communities, and supports necessary improvements to facilities, services and infrastructure. Development regarded as being in the countryside (unless supported by other policy) is restricted to agricultural, infrastructure renewable energy or minerals and waste.

9.8 CLLP Policy S5(Development in the Countryside) - Part E: Non-residential development in the countryside supports non residential development providing that it does not result in conflict with neighbouring uses and is of a size and scale commensurate with the proposed use and with the rural character of the location. Part F: Agricultural Diversification – supports farm based diversification to non agricultural activities or operations providing it supports the farm enterprise and is in an appropriate location and scale with regard to the location of business need.

9.9 CLLP Policy S14 (Renewable Energy) supports proposals for renewable energy schemes subject to the direct, indirect, individual and cumulative impacts of development on, amongst other things, landscape character and visual amenity being acceptable or capable of being made acceptable.

9.10 CLLP Policy S53 (Design and Amenity) expects all development to achieve high quality sustainable design which contributes positively to the local character and landscape. Development proposals should, amongst other things, be based on a sound understanding of the context, integrate into the surrounding, relate well to the site, protect any important local views into, out of or through the site, reflect the identity of area and contribute to the sense of place and maintain landscape quality and minimise adverse visual impacts through high quality building and landscape design.

9.11 CLLP Policy S62: Area of Outstanding Natural Beauty and Areas of Great Landscape Value. Areas of Great Landscape Value (AGLV) are locally designated landscape areas recognised for their intrinsic character and beauty and their natural, historic and cultural importance. Development proposals within, or within the setting of, AGLV shall seek to conserve, protect and enhance (where possible) the quality and distinctiveness of locally important landscapes, wildlife and historic features.

9.12 CLLP Policy S66: Trees, Woodland and Hedgerows states that planning permission will only be granted if the proposal provides evidence that it has been subject to adequate consideration of the impact of the development on any existing trees and woodland found on-site. Proposals for new development will also be expected to retain existing hedgerows where appropriate and integrate them fully into the design, having regard to their management requirements.

9.13 SKGNP Policy 2: Protecting the Landscape Character, states ‘that Development should present a soft boundary to the open countryside (including native hedges and trees) to minimise the impact of development on the landscape character’.

9.14 SKGNP Policy 6: Achieving High Quality Design requires proposals to demonstrate a high design quality that accords with National Design Guide standards, building for a healthy Life or equivalent and contributes to the character of the village. Development proposals should reinforce the character of the village. Development proposals should reinforce the character of the area as defined in the Scopwick and Kirkby Green Design Code 2020. It also mentions that development proposals should include landscaping schemes and boundary treatments appropriate to their context such as through the use of native trees and hedgerows. New development should incorporate sustainable design features to reduce carbon emissions and mitigate against and adapt to climate change.

9.15 The Council commissioned AAH Landscape Consultants to assist in the consideration and review of the landscape and visual elements of the Springwell proposal and have engaged and provided feedback and advice to the Applicant's design team on behalf of the Council throughout the pre-application stage. A full copy of the report prepared by AAH is attached as an Appendix A which has reviewed the DCO application documentation, and the following summary and conclusions is based on those comments and should be read in conjunction with the full document.

9.16 The Landscape and Visual Impact Assessment (LVIA) and the associated figures, appendices and documents provide a thorough analysis of the development and is appropriate to the scale and context of the Site. The process of assessment is thorough and well explained in the volumes, which include a clear summary of findings and identification of significant effects on the landscape and visual baseline.

9.17 By reason of its mass and scale, the development would lead to significant adverse effects on landscape character and visual amenity at all main phases of the scheme (construction, operation year 1, operation year 10). The development has the potential to transform the local landscape by altering its character on a large scale. This landscape change also has the potential to affect a wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area.

9.18 The scale and extent of development would also lead to significant adverse effects on views from receptors, by altering from views within an agricultural or rural landscape to that of a landscape with large scale solar development.

9.19 National Grid Navenby Substation is identified as the primary project to potentially generate cumulative landscape or visual effects with Springwell Solar Farm. Subsequently significant cumulative effects are identified through extending the overall area of development, increasing the land use area changed from agricultural to energy infrastructure, and also visually through increasing the extent the two schemes may likely be visible by receptor.

9.20 The cumulative landscape and visual effects of the development have the potential to bring about significant landscape and visual effects, however adjacent schemes

are relatively small, in comparison with the wider Springwell order limits schemes. We have concerns regarding effects on the national, county and regional landscape character areas. The mass and scale of these projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing these schemes across potentially several kilometres, albeit with gaps between the schemes. This is a clear and marked change to landscape character.

9.21 Tree and vegetation removal associated with the development, including wider highways improvements and access for construction, must be clarified through the examination process, and subsequently any works (such as lopping or pruning), or removal of trees and hedgerows must be agreed prior to any works commencing. Prior to any construction activities, all tree and hedgerow protection methods associated with that phase of construction should also be clarified and subsequently agreed with the appropriate authority (in this case the local planning authority). This would be to BS:5837 Trees in Relation to Construction and any subsequent arboriculture method statements, again this should be approved by the appropriate authority. In particular this should ensure existing trees, and associated root protection areas, are suitably protected throughout the entire construction period. This would also likely include areas within the order limits, but away from construction activity, such as storage areas for materials which may suffer from tracking by plant that would damage tree root protection zones.

9.22 While the submission includes landscape proposals, these are of a high level and it would be expected that if the project proceeds much more detailed plans would to be submitted and subsequently agreed with the appropriate authority prior to the commencement of any works and secured through the DCO. This would include clear detail of the areas of landscape mitigation, location and types of planting (species), as well as number, density and specification. The mitigation illustrated on the Outline Landscape and Ecology Management Plan (LEMP) [APP -0142] has been utilised to assess the landscape and visual effects of the scheme, therefore we would expect any detailed landscape proposals to consist of the area and extent shown on these plans as a minimum.

9.23 Therefore, the Council concludes that the proposed development would have **negative** landscape and visual impacts.

10. Ecology

10.1 Section 5.4 of NPS EN-1 covers biodiversity and geological conservation. The government's policy for biodiversity in England is set out in the Environmental Improvement Plan 2023, the National Pollinator Strategy and the UK Marine Strategy. The aim is to halt overall biodiversity loss in England by 2030 and then reverse loss by

2042, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. Healthy, naturally functioning ecosystems and coherent ecological networks will be more resilient and adaptable to climate change effects. Failure to address this challenge will result in significant adverse impact on biodiversity and the ecosystem services it provides (5.4.2).

10.2 Paragraph 5.4.39 states that the SoS '*should have regard to the aims and goals of the government's Environmental Improvement Plan 2023 and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere'*. Paragraph 5.4.41 goes on to state that '*the benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The SoS may take account of any such net benefit in cases where it can be demonstrated*'. Paragraph 5.4.43 states '*If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the SoS will give significant weight to any residual harm*'.

10.3 Paragraph 5.4.46 advises that development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design and the SoS should give appropriate weight to environmental and biodiversity enhancements, but any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.
Local Policies:

- CLLP Policy S14: Renewable Energy
- CLLP Policy S59: Green and Blue Infrastructure Network
- CLLP Policy S60: Protecting Biodiversity and Geodiversity
- CLLP Policy S61: Biodiversity Opportunity and Delivering Measurable Net Gains
- CLLP Policy S66: Trees, Woodland and Hedgerows
- SKGNP Policy 3: Protecting and Enhancing Biodiversity

10.4 CLLP Policy S60 (Protecting Biodiversity and Geodiversity) states that development proposals will be considered in the context of the relevant Local Authority's duty to promote the protection and recovery of priority species and habitats. Where adverse impacts are likely, development will only be supported where the need for and benefits of the development clearly outweigh these impacts. In such cases, appropriate mitigation or compensatory measures will be required.

10.5 CLLP Policy S61 (Biodiversity Opportunity and Delivering Measurable Net Gains) states that all qualifying development proposals must deliver at least a 10% measurable biodiversity net gain (BNG) attributable to the development. The net gain should be calculated using Natural England's Biodiversity Metric and be provided on-site where possible. Unless specifically exempted by Government, a biodiversity gain plan should be submitted providing clear and robust evidence for biodiversity net gains and losses. This plan should also include details of the pre-development

biodiversity value of the onsite habitat, the post-development biodiversity value of the onsite habitat following implementation of the proposed ecological enhancements/interventions, and an ongoing management strategy for any BNG proposals.

10.6 CLLP Policy S66 (Trees, Woodland and Hedgerows) states that planning permission will only be granted if the proposal provides evidence that it has been subject to adequate consideration of the impact of the development on any existing trees and woodland found on-site. Proposals for new development will also be expected to retain existing hedgerows where appropriate and integrate them fully into the design, having regard to their management requirements.

10.7 The Council has reviewed the submitted information concerning the assessment of potential ecological effects of the proposed development. The ES volume 1 Chapter 7 (Biodiversity)[APP-047] and associated appendices set out the biodiversity and ecological elements of the Applicant's ES. The Council considers that information included in [APP-047] and its appendices provides a reasonable summary of ecological interest features and likely significant effects, mitigation, and residual effects of the proposed development.

10.8 The Council notes that the ES volume 1 Chapter 3 (Proposed Development Description)[APP-043], paragraph 3.1.3 states that "The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate." The Council welcomes this approach.

Statutory Designated Sites

10.9 There are no internationally important sites designated for biodiversity within 10km of the proposal and no nationally important sites designated for biodiversity with 2km of the Order limits.

Non-Statutory Designated Sites

10.10 There are 17 non-statutory sites designated for biodiversity importance either within or within 2km of the Order limits. The locations of these non-statutory sites are set out in Figure 3 of APP-082. Where necessary avoidance, compensation and mitigation measures are proposed.

10.11 Sections of four LWS, all important for calcareous grassland flora will potentially be affected by the proposals. Creation of new calcareous grassland using a combination of green hay and natural colonisation is proposed to compensate for the areas of LWS lost and to deliver an overall increase in the amount of calcareous grassland habitat. The Council considers this approach acceptable.

Habitats Regulations

10.12 A Habitats Regulations Assessment report [APP-0150] has been prepared which assesses potential pathways for Likely Significant Effects on the Wash SPA/Ramsar/SAC which is 35km south-east of the proposed development. APP-0150 concludes that there are no Likely Significant Effects and that an Appropriate Assessment is not required.

10.13 The Wash SPA / Ramsar / SAC is internationally important for its populations of wintering and migratory waders and wildfowl. The Applicant has undertaken wintering bird surveys [APP-084] with the results indicating that it is highly unlikely that the proposed development site is functionally linked to the Wash SPA. The Council therefore agrees with the Applicant's conclusion that an Appropriate Assessment is not required however, the SoS will need to satisfy itself that sufficient information has been submitted by the Applicant to enable this conclusion to be reached.

Existing biodiversity value

10.14 A range of both desk-based studies and field surveys has been undertaken to establish the suite of habitats present within the DCO site boundary. These are described in APP-047 and associated appendices. A suite of habitat types of local importance and above were identified. The Council is of the opinion that the level of survey effort, survey methods and desk-study research undertaken to identify important habitats and establish the baseline biodiversity value is appropriate.

10.15 APP-047 identifies a range of ecological impacts. These potential impacts include both permanent and temporary or damage to habitats, including the potential for the spread of invasive non-native species (INNS).

10.16 To this end, the Applicant has prepared an outline Construction Environmental Management Plan (oCEMP), an outline Landscape and Ecological Management Plan (oLEMP), an outline Operational Environmental Management Plan (oEMP) and an outline Decommissioning Environmental Management Plan (oDEMP).

10.17 A Mitigation Schedule [APP-057] has been prepared which provides a helpful summary of the mitigation identified for the Project including embedded mitigation measures, which have been designed into the project. The Council agrees with the Applicant's approach and considers that the proposed impact avoidance and mitigation measures for construction, operational and decommissioning phases of the development are appropriate and will need to be secured in the DCO.

Protected and priority species

10.18 A suite of both desk-based studies and field surveys has been undertaken to identify 18 protected and priority species likely to occur within the DCO site boundary. These are described in [APP-047] and associated appendices. The Council has reviewed the

application in accordance with Natural England's standing advice for protected species. Having considered [APP-047] the Council considers that the survey methods used, and the survey effort deployed were appropriate. Impact avoidance measures, mitigation measures and enhancement measures are proposed to avoid significantly negative effects.

10.19 Without mitigation, the proposed development has the potential to result in negative effects on the populations of a number of species / species groups including Schedule 1 breeding birds and a farmland bird assemblage that is considered to be of County level importance. The Council agrees that subject to appropriate management, the carrying capacity of the proposed mitigation is likely to be sufficient to support the population of farmland birds. The Council considers that proposed mitigation for other species / species groups is also acceptable. Delivery and appropriate management of the proposed mitigation for construction, operational and decommissioning phases of the development will need to be secured in the DCO.

10.20 Where protected species would be affected by the proposed development, a licence from Natural England would be sought and mitigation would be secured as part of the licensing process. The Council agrees with this approach.

Biodiversity Net Gain (BNG)

10.21 The delivery of at least 10% BNG is not currently mandatory for NSIPs however it is considered best practice and the achievement of well in excess of 10% has been secured on a number of other solar DCOs granted within Lincolnshire recently including 76.8% gain in habitat units as part of requirement 9 of the Cottam Solar DCO and 69.4% within requirement 9 of the West Burton DCO. Given the scale and nature of the proposed development and what has been achievable on other, similar schemes, the Council will expect the project to deliver significantly more than 10% BNG and for this to be secured via a specific requirement within the DCO. Suggested wording for a BNG requirement is provided in the table below with relevant percentages to be added when the Applicant has updated its BNG calculations as part of the design process.

10.22 The Applicant has set out their approach to BNG in the ES volume 3 Appendix 7.14 (Biodiversity Net Gain) [APP-095]. At paragraph 1.1.4 the Applicant states that the BNG assessment document and calculations will "… be updated as part of the detailed design stage of the Proposed Development to reflect the final design and be included in the Landscape and Ecology Management Plan (LEMP)(s) submitted for approval under the requirement in Schedule 2 of the draft DCO, to demonstrate a minimum 10% BNG is achieved and the trading rules are met." In APP-047, at paragraph 7.4.24 the applicant also refers to its commitment to achieving a minimum of 10% BNG. The Council welcomes the Applicant's commitment to delivering BNG. These commitments will need to be secured via a specific requirement in the DCO and the applicant will need to demonstrate that the commitments made to

delivering BNG are achievable if BNG is to be given positive weight in the planning balance.

10.23 Based on the current assessment, the Scheme is predicted to result in a net gain of 31.66% for area-based habitat units and 20.68% for hedgerow units. The Council notes however that the trading rules set out in the Statutory BNG metric user guide are not currently being met. This is specifically in relation to the loss of native hedgerow with trees – associated with bank or ditch' habitat. The Council notes the Applicant's intention to ensure that the trading rules are met and encourages the Applicant to continue to make progress with this work to provide confirmation of what the project will deliver for biodiversity at the earliest possible stage.

10.24 The Council also encourages the Applicant to work with other developers and stakeholders in the area to identify opportunities to deliver BNG strategically. The Council welcomes ongoing engagement with the Applicant in relation to BNG.

Cumulative Effects

10.25 There are a number of development proposals of varying scales in the vicinity of this proposal. These range from small scale housing developments to NSIP scale energy developments. A list of projects is included in ES Chapter 16 (Cumulative Effects) [APP-056]. A detailed assessment of the cumulative impacts of these proposals on sensitive ecological receptors in the area will be required. Details of the approach to cumulative effects are presented in APP-056.

10.26 Cumulative effects on sensitive ecological receptors are considered for Navenby Heath Road Verges LWS, ground nesting birds and bats. The assessment concludes that given mitigation proposed for this development and likely standard / good practice mitigation proposed for other nearby there will be no significant adverse effects on these receptors arising from cumulative impacts. Assuming that proposed mitigation for this proposal is adequately secured in the DCO, the Council agrees with the applicant's conclusions in relation to cumulative effects on ecology.

Ecological Steering Group

10.27 The Council suggests that consideration is given to the establishment of an Ecological Steering Group or similar for the Proposed Development. This group should consist of key ecological stakeholders (both statutory and non-statutory). The remit of the group would be to receive updates on project progress and to advise on issues encountered during construction as well as to refine delivery of required mitigation and enhancement measures. Meetings should be held at an appropriate frequency to ensure good communication between both the developer and stakeholders.

10.28 Establishing such a group is also likely to yield benefits by assisting with the identification of opportunities for strategic working with other solar NSIP developers in the vicinity. This is particularly the case in relation to the delivery of BNG where

strategic delivery could result in significant benefits for species groups such as ground nesting birds.

Overall impact of the development on ecology and biodiversity

10.29 The Applicant's ES identifies a series of potential impacts on ecology arising from the development. These range from minor adverse impacts to significant adverse impacts depending on the species, habitat or site concerned. Measures to address these impacts are proposed and should be secured in the DCO. If the mitigation measures are secured and delivered as proposed the Council considers that the development would have a minor, temporary, negative impact on ecology.

10.30 With regard to BNG, the Applicant has signalled an intention to deliver BNG. Levels currently being predicted are subject to confirmation of final scheme designs, however, if these levels are delivered, the Council considers that overall, the development could have a positive impact in terms of BNG. Commitments to deliver a minimum of 10% BNG should be secured in the DCO if BNG is to be given positive weight in the planning balance.

11. Traffic and Transport

11.1 Paragraph 5.14.18 of EN-1 sets out that the SoS should consider the substantial impacts of traffic and therefore should ensure 'that the applicant has sought to mitigate these impacts, including during the construction phase of the development'. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the SoS should consider requirements to mitigate adverse impacts on the transport networks arising from the development. Development consent should not be withheld where applicants are willing to enter planning obligations for funding infrastructure or where requirements can be imposed mitigating adverse impacts (paragraph 5.14.20).

11.2 Paragraph 5.14.14 of EN-1 states that the SoS may attach requirements to a consent where there is likely to be substantial HGV traffic that control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements, make sufficient provision for HGV parking including to avoid prolonged queuing on approach roads and ensuring satisfactory arrangements for reasonably foreseeable abnormal disruption.

11.3 The NPPF at paragraph 116 states that "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios*."

11.4 Local Policies:

- CLLP Policy S47: Accessibility and Transport

11.5 CLLP Policy S47 (Accessibility and Transport) states that development proposals are required to contribute towards an efficient and safe transport network. All developments should demonstrate, where appropriate, that they have regard to the need to minimise additional travel demand through the use of travel planning, safe and convenient public transport, walking and cycling links, and integration with existing infrastructure. This policy also states that any development that has severe transport implications will not be granted planning permission unless deliverable mitigation measures have been identified, and arrangements secured for their implementation, which will make the development acceptable in transport terms.

11.6 The Applicant's traffic and transport assessment, ES Volume 1, Chapter 14 (Traffic and Transport) [APP-054] considers the likely effects generated by the Proposed Development during construction, operation (including maintenance), and decommissioning in relation to traffic and transport. The assessment considers how the development could cause changes in traffic numbers and vehicle types on local and the strategic road network as well as the impact on road users including pedestrians. The local highway network assessments comprise a detailed analyses where the A15, B roads and minor roads are located within a rural setting, connecting small settlements to the wider network. The greatest impacts are likely to occur during the construction phase. Construction vehicles would access the Site via the B1191, B1188, Gorse Hill Lane and Temple Road, with the A15 also an important link for construction traffic.

11.7 The Applicant has incorporated mitigation measures into the design of the scheme, these include:

- Upgrade A15/B1191/Temple Road: Provide improvement to existing conditions for all users inclusive of a non-motorised user crossing point.
- A15/Gorse Hill Lane: Improved surfacing for all users and junction infrastructure.
- B1191/RAF Digby and Ashby de la Launde widening: Improved passing opportunities for all HGVs.
- Vehicle passing bays along Temple Road: Ensure safe passage of vehicles and AILs during construction.

11.8 Further mitigations would be set out in the detailed Construction Traffic Management Plan (CTMP). With the mitigations proposed the applicant's assessment concludes that there would be no significant residual effects and the development would not have a severe impact on the operation and safety of the surrounding highway network.

11.9 The Council in its capacity as Local Highway Authority has reviewed the application documents and has been involved in meetings with the Applicant pre-submission. The Council considers that the assessment within ES Volume I - Chapter 14 (Traffic and Transport) [APP-054] and Appendix 14.1: Transport Assessment is appropriate and provides a reasonable estimate of HGV and car traffic that would be associated with the development.

11.10 The development proposes 2 junction improvements on the A15 (A15/B1191/Temple Road and A15/Gorse Hill Lane junctions) that would need the equivalent of full S278 Agreements under the Highways Act 1980. In principle, the proposals are acceptable (they involve widening and provision of right turn lanes), however, the wording of the draft DCO [APP-012] in Articles 8 and 10 would give the developer the right to do these works with no further approvals by the Council. At this stage, the technical details have not been submitted or approved and the Council would require a bond for these major works to be undertaken (so if the developer stops mid-way we are able to complete the works and make the highway safe) – all of these requirements are included in the Section 278 process and it is essential that these major works on the A15 are undertaken following the principles of this process. The Council has been engaged in discussion with the applicant regarding the provision of detail and the mechanism for securing these junction improvements, which the applicant has indicated would be via the CTMP and it is expected that this will be reflected in the Statement of Common Ground (SoCG) between the applicant and the Council in due course.

11.11 A further consideration is the impact of the development on the A15/B1202 junction which is over-capacity now and has an existing accident problem. County Council Highways has (independently of the development) undertaken a feasibility study looking at this junction and possible future improvements, referred to in table 11.1 of APP-123]. The Transport Assessment [APP-123] (paragraph 10.1.11 onwards) shows that the Springwell Solar development would have an adverse impact on this junction but does not offer any solutions to the impact of the development. The Council has continued discussions with the applicant, who is now proposing mitigation measures. These include an enhanced travel plan to reduce staff vehicle movements, a staff movement embargo at the junction between 0700-0900 and 1600-1800, and a restriction of HGV movements through the junction to five per hour in each direction. These measures are considered acceptable in principle. The Council anticipate that the application documents will be updated to reflect these discussions and we will provide further comments in due course and as above this will be progressed through the SoCG. The Council is no longer seeking a financial contribution towards an improvement scheme as initially expressed in its Relevant Representation [RR-233].

11.12 The Applicant has also provided an assessment of the potential cumulative effects of traffic and transport with other projects. The assessment considers a short-list of committed projects within the ZoI for traffic and transport. The traffic numbers submitted are considered to be acceptable, however they do not include the proposed Navenby substation as it not yet a committed development and data is not yet available. The substation will be assessed by the highway authority, including its cumulative impact with other developments, when that application is submitted.

11.13 In terms of traffic and transport effects, the Local Highway Authority, considers the assessment in the Traffic and Transport chapter to be reasonable, however, mitigation measures are required for this development and these need to be secured through the DCO to ensure the S278 process is followed with regard to the

improvement of 2 junctions on the A15. Subject to the necessary mitigations being secured and implemented, the Council concludes that traffic and transport impacts during the construction phase would be **negative** but not severe in the context of NPS EN-1 and the NPPF. Traffic and Transport impacts during operation, and decommissioning would be **neutral**.

12. Public Rights of Way

12.1 Section 2.10 of EN-3 makes several recommendations in relation to accessibility and PRoW, noting at 2.10.35 that the suitability of the access routes to the proposed site for both the construction and operation of the solar farm must be considered, with the former likely to raise more issues. EN-3 advises that applicants should keep, as far as is practicable and safe, all PRoW that cross the proposed development site open during construction and protect users accordingly. They are also encouraged to design the layout and appearance of the site to ensure continued recreational use of PRoW, where possible during construction, and in particular during operation, and to provide enhancements to PRoW and the adoption of new PRoW through the site.

12.2 Local policies:

- CLLP Policy S48: Walking and Cycling Infrastructure
- CLLP Policy S54: Health and Wellbeing
- CLLP Policy S59: Green and Blue Infrastructure Network
- SKGNP Policy 5: Conservation and Enhancement of Non-Vehicular Routes

12.3 The theme of the CLLP policies relates to the protection, maintenance, and availability of public rights of way, specifically on the grounds that they provide public access to green/natural spaces as well as provide places for exercise, health, and wellbeing.

12.4 Policy 5 (Conservation and Enhancement of Non-Vehicular Routes) of the SKGNP supports proposals that would improve or extend existing non-vehicular routes where they do not detract from landscape character or harm locally protected species.

12.5 An extensive network of PRoW link to surrounding settlements. Springwell East hosts four promoted walks which make up the 'Stepping Out' series developed by North Kesteven District Council. Existing PRoW include:

- Spires and Steeples Trail
- Scopwick Loop
- Kirkby Green Loop
- Blankney Circuit

12.6 PRoW which lie within or intersect the site:

- Public Footpath (AshL/11/1) - Bloxham;

- Public Footpath (Rows/5/1) - RAF Digby;
- Public Footpath (AshL/4/1) - adjacent to the A15, south of Gorse Hill Lane;
- Restricted Byway (Scop/12/1) - West of Scopwick;
- Public Footpath (Scop/3/1) - North of Scopwick;
- Public Bridleway (Scop/1135/1, Scop/1135/2, Scop/1135/3, Scop/1136/1) - North of Scopwick (part of the Scopwick Loop);
- Restricted Byway (Scop/11/1, Scop/11/3, Scop/11/4) - North of Scopwick (part of the Scopwick Loop);
- Restricted Byway (Scop/10/2) - North of Scopwick (Trundle Lane);
- Public Footpath (Blan/737/1) - Scopwick/Blankney (part of the Spires and Steeples Trail;
- Public Footpath (Scop/7/1, Scop/7/2) - North of Kirkby Green (part of the Kirby Green Loop);
- Public Footpath (Blan/4a/1, Blan/4/2, Scop/7/3) - South of Blankney (part of the Blankney Circuit);
- Public Footpath (Scop/1134/1) - South of Blankney;
- Public Footpath (Blan/4/3) - East of Blankney;
- Public Footpath (Blan/5/1) - East of Blankney;
- Public Footpath (Scop/738/1, Scop/739/1) - North of Kirkby Green;
- Public Footpath (Scop/8/1) - North of Kirkby Green; and
- Public Footpath (Scop/8/2) - North of Kirby Green.

12.7 The majority of PRoW and permissive paths comprise unsurfaced public footpath or restricted byways apart from Scop/1136/1 and Scop/1135/3 which are designated unsurfaced public bridleways. There are no proposals to permanently stop up any existing PRoW as part of the development, however access may be restricted for a duration of up to 6 months during the construction stage. The existing permissive paths do not require formal stopping up.

12.8 The Applicant has proposed measures in the Outline Public Rights of Way and Permissive Path Management Plan (PRWPPMP) [APP-0145] to manage any impacts to PRoW. The proposals include several new PRoW and permissive paths that would be available for use during the operational (including maintenance) phase and an upgrade to the existing PRoW between Scopwick and Blankney to bridleway status (approx. length 2,090m). This would include an upgrade of the existing surface conditions of the trail to better allow user access and enjoyment to 'all-weather' standard allowing year-round accessibility for all users. The new PRoW and permissive paths would remain beyond decommissioning. The applicant considers the proposed enhancements present a significant beneficial impact.

12.9 The three new PRoW proposed to be created are as follows:

(1) Linking RAF Digby to Scopwick (approx. length 1,670m).
(2) Connecting the existing PRoW (AshL/4/1) west of the A15 (near Navenby Lane) to New England Lane. (approx. length 830m).

(3) From Temple Road (north of Brauncewell) to the Bloxham Woods Car Park to provide a connection across the A15 (approx. length 990m).

12.10 The four new permissive paths proposed to be created are as follows:

(1) Along the western edge of the Proposed Development linking New England Lane to Temple Road, north of Brauncewell (approx. length 4,130m).
(2) Connecting the B1191 (Heath Road) with the existing PRoW between RAF Digby and Rowston (Rows/5/1) (approx. length 1,610m).
(3) A new permissive path linking Bloxholm Wood to Brauncewell Village (approx. length 1,120m).
(4) New permissive paths to provide a series of circular walking loops from Bloxholm Woods (approx. length 1,720m).

12.11 The PRoW enhancement proposals have been the subject of consultation with the Council's Public Rights of Way Officers and the enhancements to the network are welcomed. Notwithstanding that there would potentially be a negative impact on the amenity of the users of the PRoW during the construction phase from the temporary closure of some routes and from a visual amenity perspective; walking through open fields vs walking through a solar farm is a significant difference for the path user, the enhancements to the network, which would be permanent, would provide a longer term positive benefit. However, there are some points of detail in respect of the outline PROWPPMP that the Council would wish to see resolved. These matters are set out in Appendix B of this report and the Council will engage in further discussions with the applicant and make further representations throughout the examination, as necessary.

12.12 Subject to the above being addressed, the proposed mitigation measures and the requirement to submit a PRWPPMP in the draft DCO, the Council conclude that from a network perspective the proposed enhancements would be a beneficial and that the impact on the PRoW network would be **positive.**

13. Flood Risk, Drainage and Surface Water

13.1 Section 5.16 of NPS EN-1 focuses on water quality and resources. In the decision-making process, the SoS should note that activities that discharge to the water environment are subject to pollution control. Moreover, the SoS will '*need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Framework (Water Framework Directive) (England and Wales) Regulations 2017*' (paragraph 5.16.12).

13.2 EN-1 also states that the SoS should consider '*whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary*' to mitigate adverse effects on the water environment (paragraph 5.16.16).

13.3 Paragraph 5.8.7 of EN-1 notes that new energy infrastructure should only be permitted by exception in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), and that it should be safe for its lifetime without increasing flood risk elsewhere and, where possible, should reduce flood risk overall. It should also be designed and constructed to remain operational in times of flood. Paragraphs 5.8.9 and 5.8.10 confirm the requirement for the flood risk sequential and exception tests to be applied.

13.4 NPS EN-3 paragraph 2.10.154 advises that "*water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management*."

13.5 Local Policies:

- CLLP Policy S12: Water Efficiency and Sustainable Water Management
- CLLP Policy S21: Flood Risk and Water Resources
- CLLP Policy S59: Green and blue infrastructure network
- SKGNP Policy 6: Flood Risk and Drainage
- North Kesteven Flood Risk Assessment (2009 Revision Report)

13.6 CLLP Policy S12 (Water Efficiency and Sustainable Water Management) states that in addition to the wider flood and water related policy requirements of Policy S21, all residential or other development comprising new buildings with outside hard surfacing, must ensure such surfacing is permeable (unless there are technical and unavoidable reasons for not doing so).

13.7 CLLP Policy S21 (Flood Risk and Water Resources) states that all development proposals will be considered against the NPPF, including application of the sequential and, if necessary, the exception test. Proposals should demonstrate that they are informed by and take account of the best available information from all sources of flood risk and by site specific flood risk assessment where appropriate; that the development will be safe during its lifetime taking into account the impacts of climate change; how the wider scope for flood risk reduction has been positively considered; and that they have incorporated Sustainable Drainage Systems (SuDS)/Integrated Water Management into the proposals, unless they can be shown to be inappropriate.

13.8 CLLP Policy S59 (Green and Blue Infrastructure Network) states that proposals that cause loss or harm to the green and blue infrastructure network will not be supported unless the need for and benefits of the development demonstrably outweigh and adverse impacts.

13.9 SKGNP Policy 6 (Flood Risk and Drainage) states that development proposals should reinforce the character of the area as defined in the Scopwick and Kirkby Green Design Code 2020. It also states that proposals should include landscaping schemes

and boundary treatments appropriate to their context such as through the use of native trees and hedgerows or the inclusion of limestone walls. The new development should further incorporate sustainable design features to reduce carbon emissions and mitigate against and adapt to climate change.

13.10 ES Volume 1, Chapter 15 (Water)[APP-055], Flood Risk Assessment (FRA) [APP-0149) and ES Volume 3, Appendix 15.1 WFD Waterbodies Stage 1 Screening Technical Note [APP-124], considers the likely effects generated by the proposed development during construction, operation (including maintenance), and decommissioning in relation to water quality and resources.

13.11 Metheringham Beck is the closest Water Framework Directive (WFD) waterbody and the only one within the Site. APP-124 concludes that with appropriate mitigation measures in place, the development's impact on watercourses would be negligible and not significant.

13.12 A FRA has been prepared for this development as it is partly located within flood zones 2 and 3. The FRA assesses the development against the risk of flooding, from multiple sources and has concluded that an overall low flood risk to Springwell Solar Farm, given the limited extents of Flood Zone 3 and surface water flooding identified within the Site.

13.13 Although there are areas at risk of surface water flooding across the site, the risk to the development in these areas is not considered to be significant, due to the placement of infrastructure, particularly sensitive elements such as the BESS, outside the higher flood risk areas, and the elevation of Solar PV panels above the worst-case anticipated flood levels. Additionally, while there is some residual risk from reservoir flooding, this is also mitigated by elevating the Solar PV modules and String Inverters in these areas.

13.14 In order to avoid, prevent, or reduce significant adverse effects on water quality during the construction and decommissioning phases, several mitigation measures are proposed to be implemented by the applicant. These measures are detailed in the outline CEMP [APP-0140] and outline Decommissioning Environmental Management Plan (DEMP) [APP-0146].

13.15 The Council in its capacity as Lead Local Flood Authority (LLFA) has reviewed the application documents for this proposal. In terms of flood risk and drainage, the LLFA considers the assessment in ES Volume 1, Chapter 15 (Water)[APP-055] and in the FRA APP-0149 to be reasonable. Subject to the development being carried out as proposed within the DCO application documents, the outlined mitigation measures being implemented and further surface and foul water drainage details being agreed as part of subsequent DCO requirements, as proposed in the draft DCO [APP-012] requirement 10, the Council as LLFA for Lincolnshire, is of the view that impacts of this proposal would be **neutral**.

14. Cultural Heritage (Built Heritage and Archaeology)

14.1 Paragraphs 5.9.22 to 5.9.36 of NPS EN-1 set out the key considerations for determining applications where there is potential for adverse impacts on the historic environment above, at and below the surface of the ground. It requires the SoS to identify and assess the particular significance of any heritage asset that might be affected by the development, including setting.

14.2 The NPPF Chapter 16 (Conserving and enhancing the historic environment) places a requirement on applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. Similar to EN-1 it requires Local Planning Authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal. Paragraphs 212 to 216 of the NPPF align with EN-1 and require great weight to be given to conserving heritage assets and any harm or loss to a heritage asset requires clear and convincing justification. In cases where the proposal would lead to substantial harm or total loss of a heritage would result consent should be refused unless certain criteria are met, this includes where the harm or loss is necessary for sustainable public benefit. Where less than substantial harm to the significance of the heritage asset would occur it should be weighed against the public benefits. For non-designated heritage assets a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

14.3 Local Policies:

- CLLP Policy S57: The Historic Environment
- LMWLP Policy DM4: Historic Environment
- SKGNP Policy 10: Protecting Heritage Assets

14.4 Policy S57 (The Historic Environment) states that development proposals should protect, conserve, and seek opportunities to enhance the historic environment of Central Lincolnshire. Proposals will be supported where they protect the significance of heritage assets (including where relevant their setting) and consider the desirability of sustaining and enhancing non-designated heritage assets and their setting. In instances where a development proposal would affect the significance of a heritage asset (where designated or non-designated), the applicant will be required to undertake and provide information on the significance of the asset; the impact of the proposed development on the significance and special character of the asset; and a clear justification for the works so that the harm can be weighed against public benefits.

14.5 This policy also states that where development proposals would result in less than substantial harm to a designated heritage asset, permission will only be granted where the public benefits, including, where appropriate, securing its optimum viable use, outweigh the harm. In addition to this, development affecting archaeological remains, whether known or potential, designated or undesignated,

should take every practical and reasonable step to protect and, where possible, enhance their significance.

14.6 Planning applications for such development should be accompanied by an appropriate and proportionate assessment to understand the potential for and significance of remains, and the impact of development upon them. If initial assessment does not provide sufficient information, developers will be required to undertake field evaluation in advance of determination of the application. This may include a range of techniques for both intrusive and non-intrusive evaluation, as appropriate to the site.

14.7 Wherever possible and appropriate, mitigation strategies should ensure the preservation of archaeological remains in-situ. Where this is either not possible or not desirable, provisions must be made for preservation by record according to an agreed written scheme of investigation submitted by the developer and approved by the planning authority.

14.8 Policy DM4 (Historic Environment) reiterates Policy S57, and states that proposals with the potential to affect heritage assets including features of historic or archaeological importance (whether known or unknown) should be accompanied by an assessment of the significance of the assets and the potential impact of the development proposal on those assets and their settings. Where any impact on heritage assets is identified, the assessment should provide details of the proposed mitigation measures that would be implemented. These should include details of any conservation of assets to be lost and provision for the results to be made publicly available.

14.9 NPS EN-1 paragraph 5.9.21 states that where there is high probability (based on an adequate assessment) that a development site may include yet undiscovered heritage assets with archaeological interests then requirements should be considered to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction. This is largely carried through in NPS EN-3.

14.10 The applicant assessment of Cultural Heritage is set out in Chapter 9 of ES (Cultural Heritage) [APP-049]. The applicant's assessment concludes that the development is not likely to result in any significant effects on cultural heritage and with the implementation of mitigation measures, all residual effects are assessed as not significant and equate to less than substantial harm on all designated and non-designated heritage assets impacted by the development. The applicants Planning Statement [APP-0136] at paragraph 8.6.28 states that substantial public benefits and need for the development, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm as per the requirements of paragraph 5.9.32 of NPS EN-1 and the NPPF.

14.11 SKGNP policy 10 (Protecting Heritage Assets) states that:

"*1. The effect of a proposal on the significance of a non-designated heritage asset, including their setting, will be taken into consideration when determining planning applications.*

2. Gardens and open spaces form part of the special interest of the Conservation Areas. Development will only be permitted on gardens and open spaces between buildings within the Conservation Areas where it can be demonstrated that the proposals shall not harm the character and appearance of the Conservation Area."

Built Heritage

14.12 As stated in our Relevant Representation of 10 February 2025, the Council remains concerned about the assessment of built heritage assets and the extend of follow-up engagement since the Statutory Consultation stage. While some progress has been made, outstanding issues remain regarding receptors within or near the scheme that require further assessment and, where necessary, bespoke mitigation. The Council also does not support the wholesale exclusion of non-designated assets, particularly farmsteads, as several warrant further scrutiny due to potential harm to their significance.

14.13 The conservation areas of Scopwick and Blankney have been scoped out of the ES. While both Historic England and the Council are broadly content with the design revisions to date, the Council consider it premature to exclude these areas from further assessment. Their setting is influenced not only by direct views but by their wider landscape context and the kinetic experience of travelling to and between them. Excluding these areas from detailed assessment at this stage risks overlooking impacts on the character and appearance of these assets. This could diminish their sense of place and the historical and cultural context they provide for the communities they serve.

14.14 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a general duty on decision makers in exercise of planning functions to pay special attention to the desirability of preserving the character or appearance of a conservation area. Section 66 of the same Act imposes a separate duty on decision makers stating that '*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority…..shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'* Comparably, the SoS must comply with the requirements set out in Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 (NPS EN-1 paragraph 5.9.23). The regulations state that "*When deciding an application relating to a conservation area, the decision-maker must have regard to the desirability of preserving or enhancing the character or appearance of that area.*" While design revisions are noted, the decision to scope these areas out of detailed assessment does not reflect the statutory duty outlined in paragraph 14.4, nor the expectations of NPS EN-1, EN-3, and the NPPF.

Non designated farmsteads

14.15 The historic farmsteads within the order limits and wider study area are an integral part of Lincolnshire's agricultural heritage, reflecting traditional rural practices and contributing to the region's distinct historic character. The Historic Farmsteads in Greater Lincolnshire Report[2] highlights their significance, yet the current DBA assessment fails to consider their collective value, treating them in isolation rather than as part of a cohesive historic landscape. The current assessment overlooks how these farmsteads are experienced as a group, with shared historic associations that define the rural distinctiveness of the area. The introduction of large-scale infrastructure risks severing these connections, eroding both the physical setting and the intangible heritage that links these assets to Lincolnshire's agricultural past. A list of non-designated farmsteads considered particularly sensitive to change is provided at Appendix D with a brief justification for their inclusion. A comprehensive evaluation of these impacts is essential to ensure they are properly considered in decision-making.

14.16 The ES's assessment of built heritage and setting currently lacks key details and evidence to support scoping decisions and fails to address the concerns raised by the Council during the Statutory Consultation stage. The applicant should expand the scope of the assessment to include a more comprehensive analysis of designated and non-designated heritage assets and their settings. Without this information or further discussions around the issues raised in respect of the PEIR, it is impossible to fully understand the potential impact and harm this scheme may cause to the historic environment. At this stage the Council cannot agree with the applicant's conclusion that the assessment of harm would be less than substantial in respect of built heritage assets.

Archaeology

14.17 The Council considers that the works undertaken to date fall short of the level necessary to understand the significance of and impact to buried archaeology within the redline boundary of the Springwell solar project. This requirement is set out within the NPPF, EIA Regulations and NPS EN-1. EN-1 outlines requirements for understanding the significance of heritage assets that will be affected (paragraphs 5.9.9 – 5.9.15). Notably paragraph 5.9.12 states 'The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.'

14.18 Within the Solar Farm industry, reliance on the Rochdale Envelope is common, meaning that much of the design proposals are indicative and subject to change through surveys and consultation responses. The Applicants ES Chapter 3: Proposed

[2] Greater Lincolnshire Farmstead Character Statement (2015) – Historic England

Development Description [APP-043], states 'It is important to note that the exact design details of the Proposed Development cannot be confirmed until after consent is granted' (paragraph 3.2.5).

14.19 Archaeological assessment historically has been based on understanding the archaeological potential within the limits of known developmental parameters, with trenching being undertaken within the red line boundary often as a blanket approach to inform design. This approach has not aligned well with the Rochdale Envelope and recent dialogue between the archaeological and solar industries has resulted in a reorientation of positions on predetermination archaeological trenching.

14.20 Whilst the significance of any heritage assets cannot be effectively assessed until there has been sufficient evaluation to identify the currently unknown archaeology across the proposed impact zone, we will be guided by the design details yet to be provided by the Applicant prior to developing a reasonable and proportionate programme of investigation targeted on the areas of impact and ground disturbance. This level of detail is currently not available as designs are not at a sufficiently advanced stage yet and, according to APP-043 paragraph 3.2.5, won't be until consent is granted. We therefore need to maximise the information that is provided by the Applicant from desk-based assessments and surveys undertaken to date.

14.21 Due to the adoption of design finalisation post-consent, an appropriate and effective baseline is crucial to understanding the potential significance of previously unknown archaeology within the redline boundary and this alongside the detail which has yet to be provided by the Applicant would form the basis for reasonable and proportionate programme of trenching. Where an effective baseline has not been established, or only partially understood, there is an exponential risk of significant delays and increased costs to the project and harm to the historic environment, all of which could be reduced through an appropriate level of desk-based and non-intrusive assessment pre-consent.

14.22 Archaeological activity may be located across the whole of the redline boundary and it is essential that the Applicant understands all areas where works are proposed, including solar arrays, ecological enhancement, drainage, access tracks and works compounds, have the potential to contain archaeological remains and that this would not be confirmed until archaeological evaluation has taken place. PV areas may need to be investigated, if the 'precautionary measures before PV foundation installation such as grading, compaction and improving the soil due to site conditions, to be assessed and carried out during construction', as stated on Figure 3.5: Indicative Solar PV and String Inverter Cross Sections [APP-060] cannot be ruled out.

14.23 The landscape here is essentially an agricultural one, where little previous archaeological research has been completed. Therefore, baseline information held by the Lincolnshire Historic Environment Record is only partial and this lack of prior investigation reinforces the need for a programme of archaeological evaluation that covers the full redline boundary. Geophysical survey and aerial photographic analysis will not identify all archaeological activity, such as burials, even if done well. It should

be noted that every single NSIP project within Lincolnshire has encountered previously unrecorded archaeological remains during trenching that had not been picked up by the desk-based assessment, geophysical survey or aerial assessment. At a recent NSIP site in Lincolnshire (Cottam), Saxon burials were found 20cm under the topsoil during the first day of trenching. These burials had not been identified through desk-based or geophysical surveys. Any groundworks or even heavy plant movements would have destroyed these previously unknown Saxon burials if they had not been located by the trenching.

14.24 Engagement by the archaeological consultants has been limited and on the whole unsatisfactory. The Applicant has not worked with the Council to establish an effective methodology to determine archaeological impact and significance despite our role as expert advisors to the local authority on archaeological matters. We have communicated to them regarding our substantial concerns and ways in which to resolve the wholly ineffective methodology currently employed, but this has resulted in little to no change in direction by the Applicant. The lack of consultation with the local archaeological advisors, who have decades of experience working in archaeological development management within Lincolnshire, is a serious and avoidable flaw within the Applicant's methodological approach.

14.25 The language used is dismissive and implies a landscape of low archaeological potential and value, yet the limited level of assessment means these sweeping statements are not evidence-based and are misleading and unreliable. This conflicts directly with NPPF, EIA Regulations and NPS EN-1, which requires that the baseline evidence is accurate and that 'The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors…(d)material assets, cultural heritage and the landscape.' (Regulation 5 (2d)). Where the significance of heritage assets has been misunderstood or downplayed, there is a likelihood that any mitigation measures will be ineffective, leading to longer than anticipated archaeological excavation times and increased costs and delays before or during the construction phase.

14.26 The limitations are particularly evident within the aerial assessment, with only 13 aerial photographs listed as being assessed within their Appendix 9.3: Aerial Investigation Report Annex 2: Aerial photographs consulted [APP-099], for a site covering 1280 hectares. For comparison, a nearby solar farm NSIP, covering 1100 hectares, reviewed 166 Historic England vertical aerial photos and 575 Historic England specialist aerial photographs, which provided a comprehensive assessment, and discovered a number of potential archaeological sites that had not shown on the geophysical survey.

14.27 Within our Scoping Report response, we stated that "It's vital that a competent full desk-based assessment (DBA) be completed at the earliest opportunity as desk based work provides the basis for initial understanding. This is informed by and built upon by a full air photo/LiDAR assessment and geophysical survey which in turn assists in the development of the trial trenching programme". It is standard archaeological

practice to undertake full assessment of all available air photos. This is a fundamental part of archaeological desk-based work as thousands of new sites, and new information about existing sites, are found in this way.

14.28 The trial trenching undertaken within the 1280-hectare site to date consists of 196 trenches, each 50m by 1.8m and has been concentrated on areas of known major infrastructure. Where trenching has been undertaken in advance of the DCO submission, these have been undertaken to an acceptable standard.

14.29 The direct and indirect significant effects of the development on cultural heritage cannot be understood until sufficient trial trenching has been undertaken across the full impact zone and will need to be undertaken once design details have been finalised and we welcome the commitment by the Applicant within their outline Written Scheme of Investigation (oWSI) to undertake further trenching.

14.30 As previously covered within our PEIR response, Historic England Advice Note 17: Planning and Archaeology[3] states that 'Appropriate evaluation can support the smooth and speedy progression of the development and help to manage the developer's risk early in the planning process' (section 131). It also states that 'Data gathered can also help to inform a costed mitigation strategy, the benefits of which include a reduction in the chances of unexpected risks and associated costs, and potentially the scope to allocate the cost of archaeology appropriately into financial forecasts' (section 132). It is therefore important that once design details are available, these are used to update the oWSI and produce a reasonable and proportionate trenching programme targeting impact areas.

14.31 The Chartered Institute for Archaeologists Standard and guidance for archaeological advice by historic environment services[4] (paragraph 7.3.4) stipulates that 'Advisors should only make a recommendation in response to a development proposal where the significance of assets affected by the development proposal and the scale of any loss of significance is adequately understood. Where there is insufficient evidence, advisors should recommend that further information be gathered prior to determination of the proposal. Requirements for the gathering of further information should always be focused on informing decision making.' The Council, as local archaeological advisors, have considerable experience of the archaeological resource within Lincolnshire and are ideally placed to help Applicants to best understand the archaeological implications of development and where they have insufficient information to do this. We do not arbitrarily require Applicants to undertake work for no reason, but seek to maximise resources and focus them on the areas of impact with the results informing design and the mitigation strategy and management plan.

[3] Planning and Archaeology: Historic England Advice Note 17 https://historicengland.org.uk/images-books/publications/planning-archaeology-advice-note-17/

[4] Standard and guidance for archaeological advice by historic environment services: Chartered Institute for Archaeologists CIfA-SandG-Archaeological-Advice-by-HER-2020.pdf

14.32 There needs to be an appropriate mechanism, preferably secured by requirement through the DCO process, for updating the outline Written Scheme of Investigation (oWSI) [APP-148] and the location and extent of trenching once detailed design has been progressed sufficiently to understand areas of impact. The oWSI will need to be approved by the Council prior to commencing evaluation trenching. The trenching would need to be completed prior to the commencement of any ground works, including site preparation or other works.

14.33 Although pushing back trenching to the post-consent stage places the risk at the end of the process, with potential for previously unknown archaeological remains to be discovered late in the design stage, ensuring that the trenching strategy contained within the oWSI is robust and targeted will minimise the potential costly programme delays and budgetary implications. Once the trenching has been completed, the results will be used to inform the final mitigation strategy and archaeological management plan, which will need to be overseen by an Archaeological Clerk of Works and approved by the Council.

14.34 Section 7.1.2 of the oWSI states that the WSIs will conform to the requirements of the Lincolnshire Archaeology Handbook[5]. We would like to point out that all phases of works already undertaken should have been completed in accordance with the Handbook. Requirements for archaeological investigation have been set out within the handbook and have been designed by the local authority archaeological advisors' over decades in consultation with archaeological fieldwork companies and are based on what has proven to be effective and works.

14.35 Regarding the oWSI specifically, it indicates a programme will be agreed for the proposed additional archaeological works. This will only be possible for the next phase of archaeological trenching, which, once complete, would inform further phases of archaeological works and ultimately the final mitigation strategy and archaeological management plan. The scope of subsequent works and mitigation will depend on the results of the next phase. If this is the case, the Applicant needs to ensure all measures outlined in the oWSI conform to those requirements set out within the Lincolnshire Archaeology Handbook, as suggested in their oWSI. This includes excavation, recording, photography, sampling, post-excavation and archiving and public engagement.

14.36 Furthermore, the embedded mitigation measures within the oWSI are generic and their implementation or viability is dependent on further archaeological evaluation. Proposed use of non-intrusive concrete feet for solar arrays would still result in harm to fragile and shallow archaeological remains such as human burials and we have seen elsewhere that use of concrete shoes actually involves the excavation of a footing 500mm deep.

[5] Lincolnshire Archaeological Handbook (2024) https://www.lincolnshire.gov.uk/historic-environment/archaeological-handbook

14.37 Excavation is suggested by the Applicant at 13 locations within the cable corridor and a further 11 locations where avoidance is not possible. Directional drilling should be considered as a mitigation option to avoid or minimise the impact depending on the significance of the archaeological resource as well as any other areas identified through archaeological trenching.

14.38 Areas indicated as descoped within the oWSI are shown to be part of the development on scheme drawings and these will need to be revised once areas of impact have been identified. Areas of ecological enhancement/green, areas of solar arrays and cabling, and primary and secondary construction compounds need to be included in the trenching programme. Areas without ground disturbance can be omitted from the targeted trenching with the understanding that if they are to be included at a later date, they may need to be archaeologically assessed.

14.39 Once the programme of trenching has been completed, the scope and nature of mitigation will need to be revised accordingly based on the results and significance of archaeology revealed. Where the extent of any archaeological remains is unclear, mitigation areas will need to extend and cover any areas of unknown, unevaluated land.

14.40 Sufficient flexibility will need to be built into the works programme to account for archaeological remains of high significance which require additional resources and capacity to preserve them in a manner appropriate to their significance.

14.41 Policy S57 The Historic Environment of the CLLP states that "Development proposals should protect, conserve and seek opportunities to enhance the historic environment of Central Lincolnshire". There is little to no consideration of enhancement of the historic environment within the Springwell proposals. There is no mention of public engagement or evidence that any thought has gone into involving the local community when undertaking archaeological works. This is poor practice and represents a major barrier to achieving a successful outcome to any archaeological project. Interest in archaeology, particularly any remains which have been found locally, can be massive and, if done well, can have the potential to foster high amounts of positive publicity. It can increase both physical and mental well-being and offset elements of a development which may be poorly perceived or have a visibly negative impact on surrounding communities. We would expect a Public Archaeology and Community Engagement strategy to be included within the final archaeological management strategy.

14.42 The work undertaken to date is limited, in part due to a lack of details available to understand the location of impacts arising from the scheme. Improvements can be made within the documentation submitted, particularly the Aerial Investigation Report [APP-099], and this will contribute to and inform design prior to the programme of trenching.

14.43 The proposed Requirement 11 covering archaeological works post-consent is not appropriate or fit for purpose given that much of the archaeological trial trench

evaluation is proposed to be completed post-DCO. The wording suggested is vague and not sufficiently enforceable. We would advise that the wording accepted at the Mallard Pass, Cottam and West Burton Solar Farms, all recently consented NSIPs within Lincolnshire, is included for Springwell, should the scheme be consented. The wording utilised within the Mallard Pass Requirement has been deemed to be appropriate and allows for a reasonable and robust level of archaeological works to be undertaken and appropriate mitigation, informed by sufficient evaluation, to be deployed.

14.44 The SoS's decision letter for Mallard Pass[6] notes in paragraph 4.28 the ExA's noted the host local authorities, other IPs and MPAG concerns regarding insufficient evaluation of the extent of buried archaeology, and that the ExA '*held concerns regarding the Applicant's evaluation of potential archaeological remains and limited extent of trial trenching [ER 3.5.83] and the ExA considers there is a risk of disturbance to as yet undiscovered remains from piling associated with the construction of the solar PV arrays [ER 3.5.83'*]. The SoS in paragraph 4.31 goes on to conclude that '*taking all the matters into account, and with the draft wording of Requirement 10 in place making provision for further trial trenching as appropriate, that it is satisfied that the Proposed Development would be capable of appropriately safeguarding archaeological assets at the site*'. The draft and subsequent final wording of Requirement 10 as follows:

(1) The authorised development may not commence until:

(a) a scheme for additional trial trenching has been submitted to and approved by both relevant planning authorities, in consultation with Lincolnshire County Council and Historic England;
(b) additional trial trenching has been carried out in accordance with the scheme approved under sub-paragraph (a); and
(c) updates are made to the outline written scheme of investigation to account for the results of the additional trial trenching carried out and the updated outline written scheme of investigation is submitted to and approved in writing by both relevant planning authorities in consultation with Lincolnshire County Council and Historic England.

(2) The authorised development must be carried out in accordance with the updated outline written scheme of investigation approved under sub-paragraph 1(c).

14.45 Subsequent examination of the Cottam Solar Farm also identified similar issues with the level of evaluation trial trenching of buried archaeological remains carried out, with the Council noting that over 80% of the Order Limits had not been trial trenched

[6] Mallard Pass Solar Farm Secretary of State Decision Letter (12 July 2024) https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010133/EN010133-002077-Secretary%20of%20State%20Decision%20Letter%20-%20Cottam%20Solar%20Project.pdf

and that an adequate baseline would not be achieved until archaeologically sensitive areas had been identified and their depth, extent and significance determined. The ExA also considered the submitted WSI did not provide for sufficient trial trenching to properly protect archaeological remains from harm. In response a 'without prejudice' WSI was produced by the applicant which the ExA considered appropriate. Following the submission of the ExA report, the SoS undertook a consultation on revised wording for Requirement 12 as drafted by the applicant. The Council, Nottinghamshire County Council and Historic England disagreed with the proposed wording which they considered unclear, and proposed the use of the archaeology requirement wording from the Mallard Pass Solar Farm DCO. The SoS in paragraph 4.41 of the Cottam Solar Farm decision letter[7] '*acknowledges the need for the requirement to ensure that the entire archaeological process and mitigation is appropriately secured. Noting the issues raised by LCC and NCC in relation to trial trenching and the proposed mitigation, the Secretary of State concludes that he is satisfied with adopting wording, aligned with the 'archaeological requirement' incorporated into the DCO for Mallard Pass, in Requirement 12 of the DCO. The Secretary of State considers that an updated WSI, informed by additional trial trenching, to be approved by the relevant planning authorities will be fit for purpose.'*

14.46 The West Burton SoS Decision Letter[8] considered the concerns expressed by both the Council and Nottinghamshire County Council regarding the extent of trial trenching (a concern also expressed by Historic England), and the WSI. The Decision Letter also notes in paragraph 4.126 that the ExA considered that the Applicant's WP WSI would be sufficient to assess archaeological interest, however noting that 'measures for securing the locations of the additional trenching and provisions for addressing the results in a final WSI would need to be managed through DCO Requirement 12 [ER 3.4.85]'. The SoS agreed with HE's suggested mirroring the equivalent requirement in the Cottam Solar DCO as made and amended the DCO accordingly.

14.47 We remain positive and keen to work with the applicant going forwards in establishing an effective approach to understanding, managing and mitigating the archaeological risk that will occur and maximising the public benefit that will be gained from the archaeological work.

14.48 From the above it is clear that there is considerable uncertainty over the extent of buried heritage assets due to the inadequate amount of trial trenching undertaken. There is a real possibility that remains of more than local/regional significance could be found. Consequently, given this uncertainty, it is not yet possible to understand or quantify the level of impact upon buried heritage significance within the Order limits.

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[7] Cottam Solar Farm Secretary of State Decision Letter (5 September 2024) https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010133/EN010133-002077-Secretary%20of%20State%20Decision%20Letter%20-%20Cottam%20Solar%20Project.pdf

[8] West Burton Solar Project Secretary of State Decision Letter (24 January 2025) https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010132/EN010132-002064-Decision%20letter.pdf

There is therefore a **negative** construction impact upon the archaeological remains in relation to the Order limits with the degree of harm as yet unquantifiable due to the insufficient evaluation undertaken so far.

14.49 Overall, the Council concludes that the proposed development would have a **negative** impact on heritage assets.

15. Land, Soil and Groundwater

15.1 Local policies

- CLLP Policy S14: Renewable Energy
- CLLP Policy S21: Flood Risk and Water Resources
- CLLP Policy S67: Best and Most Versatile Agricultural Land
- LMWLP Policy DM12: Best and Most Versatile Agricultural Land.

15.2 Under the subheading 'additional matters for solar based energy proposals', CLLP Policy S14 (Renewable Energy) states that proposals for ground-based photovoltaics and associated infrastructure, including commercial large scale proposals, will be under a presumption in favour unless, amongst other things, the proposal is (following a site specific soil assessment) to take place on BMV agricultural land and does not meet the requirements of Policy S67.

15.3 CLLP Policy S67 (Best and Most Versatile Agricultural Land) states that proposals should protect BMV agricultural land so as to protect opportunities for food production and the continuance of the agricultural economy. Significant development resulting in the loss of BMV agricultural land will only be supported if:

- The need for the proposed development has been clearly established and there is insufficient lower grade land available;
- The benefits and/or sustainability considerations outweigh the need to protect such land, when taking into account the economic and other benefits of the BMV agricultural land;
- The impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions; and
- Where feasible, once any development which is supported has ceased its useful life, the land will be restored to its former use.

15.4 NPS EN-1 at paragraph 5.11.12 provides similar advice that applicants should seek to minimise impacts on the BMV agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC)) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). Paragraph 5.11.34 of EN-1 states that the SoS *"should ensure that applicants do not site their scheme on the BMV agricultural land without justification."* Where it is sited on BMV, it should *"take into account the economic and other benefits of that land"* and where it is demonstrated necessary, areas of poorer quality should be preferred to higher quality land.

15.5 Under the heading of 'Solar Photovoltaic Generation', paragraph 2.10.29 of the NPS EN-3 states that "'*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. 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*."

15.6 Paragraph 2.10.30 notes that 'Whilst the development of ground mounted solar arrays is not prohibited on agricultural land classified 1, 2 and 3a, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 - 2.10.92 and 2.10.107 - 2.10.126.'

15.7 Paragraph 2.10.31 acknowledges that it is likely that applicants' developments may use some agricultural land, however that 'Applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land.'

15.8 Paragraph 2.10.32 goes on to state that where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, or storage) to maximise the efficiency of land use.

15.9 Paragraph 2.10.145 reiterates that the SoS should take into account '*the economic and other benefits of the best and most versatile agricultural land*' and that '*The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources*.'

15.10 On 15 May 2024, a Written Ministerial Statement ("WMS") was published on solar infrastructure and protecting food security and BMV land. The Council notes that the 15 May 2024 WMS emphasises elements of the 2024 NPSs. In particular the 2024 WMS emphasises that when considering whether planning consent should be granted for solar development the cumulative impacts where several proposals come forward in the same locality should be considered, with the WMS specifically referencing these issues in Lincolnshire '*we are increasingly seeing geographical clustering of proposed solar developments in some rural areas, such as in Lincolnshire'*.

15.11 The potential impacts on BMV agricultural land in respect of the Springwell proposal and cumulatively with other projects (both NSIP and Town and Country Planning Applications (TCPA)) that are emerging/known about in Lincolnshire are of significant concern to the Council. The Council will seek to protect high quality agricultural land in Lincolnshire (Grades 1, 2 and 3a) from development in accordance with its Energy Infrastructure Position Statement adopted 5 December 2023. This statement acknowledges that Lincolnshire has a high proportion of best and most versatile

agricultural land, which is the basis for its prosperous agricultural industry. The Council will object to proposals on Grade 1, 2 and 3a agricultural land.

15.12 Lincolnshire has the largest combinable crop output of any UK county, with about 12% of England's arable crop area. The county's combination of climate, soil type and topography make the county ideal for a variety of crops with 437,591ha of land given over to agriculture and horticulture, and producing by value circa 10% percent of England's cereal, 25% of vegetables and 14% of industrial crops (sugar beet, oil seed rape and protein crops). This has led to the area having the UK's leading concentration of fresh produce processors, traders and technology suppliers. This high level of production is vital to the county's economy, which in 2023 amounted to a total crop output of over £1,564 million and a total livestock output of £555 million.

15.13 To preserve fresh produce and minimise supply chain distance, highly productive food hubs have built up in the south of the county. The importance of this sector for the local economy is reflected in the number of jobs it generates with an agricultural workforce of 12,000. If this food supply chain is included alongside food retail and catering in the county, the number of employees exceeds 100,000.

15.14 Landscope Consultants have been commissioned for the benefit of both NKDC and the Council to assist in the consideration and review the Agricultural land and Soils aspects of the Springwell proposal and have engaged and provided feedback and advice to the Applicant's design team on behalf of the Councils throughout the pre-application stage. A full copy of the report prepared by Landscope is attached as an Appendix C which has reviewed the DCO application documentation and the following summary and conclusions incorporates comments of Landscope and should be read in conjunction with the full document.

15.15 The ALC land surveyed represents a total area of 1,620.9 ha across the three locations Springwell areas Eastern, Central and Western and the Cable Corridors. It is mostly in the ownership of one landowner, a major estate in the locality with significant farming interests. The results in the ALC reports have been undertaken by a professional team in agreement with Natural England and the results are considered reliable. The outline Soil Management Plan (oSMP) [APP-0144] should deal with construction, operation and decommissioning concerns. Land drainage is always an issue to consider on the heavier soils, but a plan is in place.

15.16 The split of BMV vs non-BMV across the area assessed in the ALC reports (1620ha), is 733 ha of non-BMV land (45.22%) and 887.9ha (54.77%) of BMV land. Around 360ha outside of the Order limits were surveyed and have now been removed from the scheme. The order limits now extend to 1280ha and the overall ALC findings indicate that approximately 42% of the site is assessed as BMV land. All of the Grade 1 land has been excluded from development and most of the Grade 2 land. The total area proposed under solar PV panels is 591ha (Table 11.13 Appendix 3 of ES Chapter 11 [APP- 112-114]). Of this the proportion of BMV land 35.6% (210.7ha) would be under solar PV panels. Other infrastructure (BESS, collector compounds, Springwell substation and main collector compound and green infrastructure) would take a

further 129.8ha, 77ha of which would represent a permanent loss (table 11.2 APP-112].

15.17 The difference between Grade 3a and 3b agricultural land is however quite small in this instance and there is a degree of subjectivity about the difference, although the ALC findings are not disputed.

15.18 Soil structure can be significantly damaged during the construction phase due to heavy vehicle traffic. If this work is done when soils are wet, there can be significant damage. While much of this damage can be remedied post-construction, but not all and it is possible that long-term drainage problems may occur.

15.19 The scale of the project and the amount of BMV land, makes the impact significant at both District and County level. The information submitted argues that the area to be lost to the proposed development amounts to only 0.13% of the farmed area of Lincolnshire [APP-072 Paragraph 16.8.10]. However, the cumulative effect is significant for Lincolnshire and the District. There are several other large solar schemes proposed or approved across the wider area that contribute to this impact.

15.20 The 2024 UK Food Security Report[9] identifies that '*Water and land, important agricultural inputs, are under increasing human and geopolitical competition and are being used at an unsustainable rate. The food system's essential natural resources continue to be depleted without being recovered for future use.*' By reducing the amount of BMV land available by incrementally removing land for large infrastructure projects puts additional pressure on the remaining land to keep agricultural production supply stable, or alternatively more food will have to be imported with the sustainability implications of food miles and associated carbon emissions.

15.21 ES Chapter 16 'Cumulative Effects' [APP-072] provides a methodology to compare BMV of solar farms against the total BMV in Lincolnshire of 410,000 ha, (paragraph 16.8.9), a figure with which the Council agrees. The Zone of Influence (ZoI) identified comprises solar farms the county of Lincolnshire, in addition to any solar developments within 1km of the border with Nottinghamshire. The BMV identified has then been calculated as a percentage of Lincolnshire's BMV resulting in a figure of approximately 2% (paragraph 16.8.10). Table 16.12 'BMV agricultural land: temporary loss per cumulative development' has a number of issues:

- the ZoI within includes solar farms outside Lincolnshire, which are then included in the cumulative BMV figure which is then used to calculate the BMV impact against the Lincolnshire BMV figure. Numerically the 2% figure is correct however the methodology results in a skewed result.

[9] https://www.gov.uk/government/news/uk-food-security-report-2024-published

- some NSIPs have progressed further through the NSIP stages and updated BMV figures are now available
- Leoda Solar NSIP has been omitted from the assessment
- only 2 Town and County Planning Act (TCPA) Solar Farms are included in the calculation when there are significantly more.

15.22 Using data from the Renewable Energy Planning Database: quarterly extract[10] for Lincolnshire, which has been updated to include information up to 22 May 2025, TCPA ground mounted solar farms of 1MW or above which are operational, under construction, granted planning permission and/or approved at appeal, cover an additional 1584ha of BMV land in Lincolnshire. Removing the NSIP developments in Nottinghamshire from the table, updating the NSIP BMV information and including the TCPA solar farm BMV provides a figure of 1.4% of BMV land which is, or will be, used by solar farms. Please note One Earth Solar which straddles the Lincolnshire/Nottinghamshire border has been included in this calculation. As per the Springwell methodology ([APP-072] Paragraph 16.8.5) where there is no quantification of BMV, the provisional ALC maps have been used to make an informed estimate and where Grade 3 is shown, an assumption has been made that 50% will be subgrade 3a and 50% subgrade 3b.

15.23 Whilst loss of BMV land under the solar PV panels is considered as temporary, 40 years is a long period of time. In addition to this temporary loss, there would be considerable permanent loss of BMV land as a result of this proposal (mainly due to green infrastructure) which is significant, amounting to around 77 ha of BMV land.

15.24 It is noted that mitigation has been embedded into the scheme with fields that were identified as comprising solely of Grade 1 or 2 land were discounted from the area of Solar PV development to reduce the impact on Best and Most Versatile (BMV) agricultural land. It is noted however in ES Volume 2: Figures Chapter 11: Land, Soil and Groundwater, Chapter 11, Table 11.12 [APP-067] that 77.1ha is considered a permanent loss of BMV to Green Infrastructure. According to the Institute of Environmental Management & Assessment (IEMA) Guide 'A New Perspective on Land and Soil in Environmental Impact Assessment' (February 2022) 'the permanent loss, or reduction in quality, of more than 20ha of agricultural land due to development is of very high magnitude' which is acknowledged as 'major' in Table 11.7. It is noted however that ES Volume 1 Chapter 4: Reasonable Alternative Considered [APP – 044] Table 4.3 states in the final row that '*The fields discounted from Solar PV development, as detailed above, were retained within the Order Limits as Mitigation and Enhancement Areas to potentially provide ecological mitigation, green infrastructure opportunities, access and cable routing*.' The permanent land take for Green Infrastructure affects a total area of 166.2ha, of which 77ha are classified as BMV land which is adverse in terms of availability of agricultural land. Paragraph

[10] Renewable Energy Planning Database: quarterly extract - GOV.UK

11.9.21 considers this would be beneficial for soil quality, however the Council considered this argument is irrelevant given that 166.2ha (including 77.1ha BMV) of land is considered as a permanent loss.

15.25 Nevertheless, the whole area is productive farmland, which would be removed from mainly arable farming for 40+ years and at best, a lower intensity grass based system would replace it. The loss of arable production is considered locally significant and in view of other projects in the wider District and County potentially cumulatively significant. For context, the total arable crops and uncropped arable land in Lincolnshire is 385,930ha according to figures published by DEFRA[11], the total land proposed to be covered by solar farms, NSIP (order limits) and TCPA applications, is approximately 13,620 ha. On the assumption that the majority of land proposed for solar farms is arable land (around 3.5% of the arable total) and based on the total crop output figure of £1,564 million for 2023[12], the potential loss of crop output could be in the region of £50 million.

15.26 Should development go ahead, there would be a significant loss of the best classifications of agricultural land, with a significant loss of economic and other benefits. This loss of BMV land is contrary to national policy in the NPS EN1 and EN3 and Policy S67 of the CLLP.

15.27 As such the Council concludes that the proposals would have a **negative** impact on agricultural land.

16. Socio-economics (Population)

16.1 Key Policies:

- CLLP Policy S48: Walking and Cycling Infrastructure
- CLLP Policy S54: Health and Wellbeing
- CLLP Policy S59: Green and Blue Infrastructure Network

16.2 NPS EN-1 section 5.12 deals with the socio-economic effects of major energy infrastructure and requires applications to include an assessment of relevant impacts including:

- The creation of jobs and training opportunities.
- The provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities;
- Effects on tourism.

[11] County/Unitary Authority https:/www.gov.uk/government/statistical-data-sets/structure-of-the-agricultural-industry-in-england-and-the-uk-at-june

[12] Total Income from Farming in the Regions - GOV.UK

- The impact of a changing influx of workers during the different construction, operation, and decommissioning phases of the energy infrastructure.
- Cumulative effects.

16.3 NPS EN-1 makes reference to a list of potential impacts to consider which mirror those set out above, with an additional reference to the contribution to low carbon industries. It also refers to the need for the SoS to require the approval of an employment and skills plan.

16.4 ES Volume 1 Chapter 13: Population [APP-053] provides an assessment of the likely effects of the development to the population primarily in relation to the socio-economic effects which may occur as a result of all phases of the proposed development. Overall it is considered to be well sourced and does seek to create strategic alignment with Greater Lincolnshire opportunities.

16.5 However, the reality of net additional employment average of approx. 20 FTEs in Lincolnshire during the operation phase, with the bulk of FTE coming in a 4 year span during construction, when placed against other strategic opportunities such as STEP fusion and industrial decarbonisation, is small. Some scope on the nature of the long term operational requirements in terms of skills would therefore be welcomed.

16.6 In terms of construction employment the ES Volume 1 Chapter 13: Population [APP-053], paragraph 13.7.1 estimates that an average of 400 jobs to 650 peak jobs for four years would be supported by the development. While it is appreciated that efforts are to be made to resource a local workforce and at paragraph 13.7.30 anticipates that only 6% of the workforce would stay in the area, this number of jobs would result in a significant temporary workforce either commuting or staying in Lincolnshire, particularly when accumulated with other schemes. However, the 6% figure is likely underestimated, as applying data from all construction jobs to a specialised role like this may be inaccurate. There could be significant resultant demographic changes, changes to housing demand, changes to other local public and private services, and socio-cultural impacts. An example would be a concentration of workers in any one place creating needs on NHS services. Better understanding on the size and social make-up of likely temporary workforce would allow better understanding of these impacts.

16.7 Paragraphs 13.7.17 to 13.7.26 of the ES Volume 1 Chapter 13: Population [APP-053] considers the temporary impacts on tourism. The Applicant acknowledges at 13.7.26 of APP-053 that significant visual effects from PRoW and the Stepping Out Network may adversely impact the number of visitors to the area. The Council are concerned that the proposal would have an negative impact on tourism through the loss of tourists who use the network and do not agree with the applicant's conclusion that as other routes of the network may continue to be used the residual impacts associated with the loss of tourism, such as potential loss of business are not likely to be impacted.

16.8 In terms of the agricultural economy, the temporary land take during the operational phase (ES Volume 1 Chapter 13: Population [APP-053] paragraph 13.7.53) in reference to agricultural land loss makes some broad assumptions in relation to the current land use. This appears to be indicative and could be clarified further.

16.9 NPS EN-1 requires developers to demonstrate that local suppliers have been considered in any supply chain. It is noted in Table 13.1 of ES Volume 1 Chapter 13: Population [APP-053] that '*there is the potential beneficial effects on education and skills associated with the Applicant's intention to recruit and where possible upskill staff form the local area'*. The Outline Employment, Skills and Supply Chain Plan [APP-0153] proposes at 1.15.2 the formation of a Working Group to develop a more detailed Plan, with the Council and NKDC being at the core of the working group. The involvement of the Councils in the working group is welcomed. The significant commitment to prioritising local supply chain where possible needs to be further reflected and refined in the final version of the Employment, Skills and Supply Chain Plan.

16.10 There appears to be a gap in the Outline Employment, Skills and Supply Chain Plan [APP-0153] with regards to independent training providers/charitable organisations that deliver Adult Learning programmes. The Council's Adult Learning & Skills Team hosts two Regional Adult Skills Groups (one for Lincoln / West Lindsey / South and North Kesteven regions, and one for Boston / South Holland /East Lindsey regions) where providers meet on a bi-annual basis. The aims of these groups are to raise awareness of projects on the horizon, discuss opportunities for collaboration and identify and gaps in provision. It would be beneficial to include information on the Regional Adult Skills Groups in the Outline Employment, Skills and Supply Chain Plan. The Adult Learning & Skills Team would welcome further engagement.

16.11 Given the commitment to skills, employment and the local supply chain set against the temporary nature of the majority of the employment, the more specialist nature of solar specialist suppliers, on balance the Council considers the impacts associated with matters on socio-economic impact to be **neutral** notwithstanding the impact to agricultural land however remains negative as concluded in Section 15 above.

17. Public Health

17.1 Paragraph 1(8) of Schedule 4 to the EIA Regulations requires consideration to be given to the risks of major accidents and disasters but does not include a definition of these terms.

17.2 Paragraph 4.4.1 of NPS EN-1 states that '*energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health'*.

17.3 Paragraph 4.2.15 of EN-1 identifies the approach to be taken for non-Habitat Regulations Assessment (HRA) residual impacts of CNP infrastructure, it states that *"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero."*

17.4 Paragraph 4.2.16 goes on to state that *"as a result, the SoS will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPS's or any other planning policy, which requires clear outweighing of harm, exceptionality, or very special circumstances."*

17.5 Local Policies:

- CLLP Policy S54: Health and Wellbeing
- SKGNP Policy 8: Enhancing the Provision of Community Facilities

17.6 Policy S54 states that the potential for achieving positive mental and physical health outcomes will be taken into account when considering all development proposals. Where any potential adverse health impacts are identified, the applicant will be expected to demonstrate how these will be addressed and mitigated. The Central Lincolnshire authorities will expect development proposals to promote, support and enhance physical and mental health and wellbeing, and thus contribute to reducing health inequalities. The provision of a Health Impact Assessment for development of 5 ha or above is required to demonstrate how the conclusions of the HIA have been taken into account in the design of the scheme.

17.7 SKGNP Policy 8 (Enhancing the provision of community facilities) states that proposals to improve community facilities within the Parish will be supported where;

(i) Consultation in accordance with the Key Principle (in section 9 of the SKGNP) has been undertaken and demonstrates support for the proposal; and
(ii) The design and location of the scheme is in accordance with the other policies in the SKGNP.

17.8 It is disappointing that a human health chapter was determined as out of scope for the ES and that the developer did not undertake a health impact assessment. The information contained in the chapters that are relevant to population health do not provide sufficient assurance that the mental health impacts of a solar farm development on such a significant scale (1,280 hectares) have been adequately addressed. The area covered by this development, straddling two main routes from Sleaford to Lincoln, means it will affect far more people than just those living in the study area.

17.9 The Population chapter does not relate potential negative impacts, or positive gains, to the health profiles of the local population, or identify vulnerable groups who may be affected by the development. For example, Heath Farm Autism Care has a residential care centre on Heath Lane, adjacent to RAF Digby and, therefore, close to the development site. It is noted that a 185 acre solar farm application at Alfreton, Derbyshire was refused at appeal[13] and although not a reason for refusal, the Inspector noted that due to the proximity of Alfreton Park Community Special School '*Pupils at the school are amongst the most vulnerable in society with a range of special needs, where conventional assessment of noise pressure levels may not be sufficient to prevent a harmful effect. I do not doubt that where children have complex audio-sensory processing difficulties perhaps with a hypersensitivity to noise, they may be disturbed by unusual tonal elements or unexpected sounds, and that this can be very difficult to manage'*, and that '*The interests of vulnerable people are an important consideration but one that must be balanced against the public benefits of the proposal in the form of tackling climate change and the supply of renewable electricity.*'

17.10 It is also noted that the site is in a predominantly affluent area, however, Indices of Deprivation (IMDs) shown at Lower Super Output Area (LSOA) level in the ES Volume 2: Figures Chapter 13: Population [APP-069] can however mask pockets of deprivation in rural areas.

17.11 Landscape and visual impacts are shown to be relevant to the construction and decommissioning phases but are also prevalent during operation. The impact on households where their current view is significantly altered, is not felt to have been adequately addressed or mitigated. Obscuring open countryside with 3.5m high hedging to screen the solar arrays or bunding could create a feeling of enclosure. It is accepted that new hedgerows and woodland in general can be beneficial[14], however there is no indication that new woodland would be accessible to the public.

17.12 Opportunities to enhance mental and physical health and wellbeing are limited to a community growing space and enhancements to the PRoW network for walkers, cyclists, and horse riders. It is felt there could be significantly more community gain. Public Health would like to influence the allocation of the ongoing Springwell Community Fund to maximise the potential gain(s) for population health improvement.

17.13 Continuing to facilitate walking, cycling and horse riding (bridleways) is welcomed, but could potentially be outweighed by people worried about and not wishing to walk between fields of solar arrays or close to underground cabling and associated infrastructure. The technical summary [APP-134] acknowledges that "the routes next to Springwell Solar Farm may be used less" and so could impact on opportunities for

[13] Appeal Ref: APP/M1005/W/22/3299953 Land north west of Hall Farm, Church Street, Alfreton DE55 7AH Appeal decision 3299953 .pdf

[14] Valuing the mental health benefits of woodlands (2021) – Forestry Commission

physical activities for locals as well as tourism. It is not evident that the developer has undertaken a survey of current PROW usage, and therefore the statement in the Tourism section in the Technical Summary [APP-134] that '*Public rights of way and the Stepping Out Network Trails are heavily used by tourists and therefore significant visual effects may deter tourists from visiting the area. However, the network has been designed to link routes together and although the routes next to Springwell Solar Farm may be used less, the wider network is not likely to be impacted.'* cannot be verified as there is no baseline information or monitoring proposed.

17.14 The Public Health Division is satisfied that air quality, noise, and glint and glare issues during all phases of the development have been considered in relevant chapters of the ES. However, the ExA should be guided by the opinion of NKDC Environmental Health Services and the UK Health Security Agency (UKHSA) on these issues.

17.15 The Council acknowledge that the potential health impacts associated with electromagnetic fields around solar arrays, substation, powerlines, and cables have been considered. It needs to be demonstrated that potential actual exposure to radiation (which includes electromagnetic fields) would comply with exposure limits developed by the International Commission on Non–Ionizing Radiation Protection. The ExA must consider consultation comments submitted by Radiation Protection Services of the UKHSA on this aspect of the development.

17.16 There is potential for accidents and fires associated with the development which would impact on the health of the public. It is noted that the settlements local to Springwell Solar Farm have sensitive receptors along them and it is noted there are a number of additional mitigation measures have been proposed. The potential for an increase in road traffic accidents, mostly because of large vehicle movements through the construction and decommissioning phases, should be mitigated to the satisfaction of Highways and the Lincolnshire Road Safety Partnership. Adequate provision to extinguish both an initial fire, and reignition once on-site suppressants have been exhausted, associated mainly with the substation infrastructure, should be ensured – please see further comment in Section 20.

17.17 The Council's public health comments should be read in conjunction with responses submitted by the Office for Health Improvement and Disparities (OHID) and the UKHSA.

17.18 Therefore, on balance the Council considers the impacts associated with matters on health to be **negative**.

18. Minerals and Waste

Minerals

18.1 Paragraph 5.11.19 of NPS EN-1 states, "*Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place*."

18.2 The NPPF paragraph 222 emphasises the importance of a sufficient supply of minerals to provide infrastructure, building, energy and goods that the country needs. It goes on to say at paragraph 223 (c) that planning policies should safeguard mineral resources by defining MSA and Mineral Consultation Areas (MCA); and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked).

18.3 Local Policies:

- LMWLP Policy M11: Safeguarding of Mineral Resources
- LMWLP Policy M12: Safeguarding of Existing Mineral Sites and Associated Minerals Infrastructure

18.4 LMWLP Policy M11 (Safeguarding of Mineral Resources) requires proposals for development within a mineral safeguarding area (MSA) to be accompanied by a Minerals Assessment and will only be granted where it can be demonstrated that it would not sterilise a mineral resource. Where this is not the case then proposals will need to demonstrate compliance with a range of criteria.

18.5 LMWLP Policy 12 (Safeguarding of Existing Mineral Sites and Associated Mineral Infrastructure) safeguards existing mineral sites that supply minerals in the county from development that would unnecessarily sterilise the sites and infrastructure or prejudice or jeopardise their use by creating incompatible and uses nearby.

18.6 Parts of the Springwell Solar order limits are situated within a Limestone MSA within the Council's administrative boundary and two existing mineral (limestone)extraction sites adjoin the order limits boundary. Brauncewell Quarry directly adjoins Springwell West and Longwood Quarry adjoins Springwell East separated by the B1188. Please note that paragraph 3.1.2 of the applicants Planning Statement [APP-136] refers to it being located in the MSA for sand and gravel; we believe this to be an error.

18.7 A minerals safeguarding report is included in the Planning Statement at Appendix 2 [APP-0136] which provides an assessment of the proposed development against LMWLP policies M11 and M12. Policy M11 (Safeguarding of Mineral Resources) sets out criteria that would need to be met by a developer where the non-mineral development would sterilise minerals in an MSA in order for planning permission to be granted. These criteria include (but not limited to) demonstrating that:

- prior extraction of the mineral would be impracticable and that the development could not be reasonably sited elsewhere; or
- there is an overwhelming need for this development, which could not reasonably be sited elsewhere; or
- the development is temporary in nature and that the site can be restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed.

18.8 The applicant considers that there is an overwhelming need for the development in this location and there is not a suitable alternative location elsewhere.

18.9 Due to the temporary nature of the development (proposed 40 year operational life), the applicant considers that the proposal would be reversible and would not permanently sterilise the resource or hinder future extraction. The solar PV development would be decommissioned and removed. The land would be restored to its former use and potentially be available for mineral extraction should there be a need.

18.10 In terms of the safeguarded mineral sites safeguarding measures include a 250-metre buffer zone around the two adjoining quarries to protect the existing operations and any future use of land or associated infrastructure (Policy M12: Safeguarding of Existing Mineral Sites and Associated Minerals Infrastructure). The majority of this land is proposed for green infrastructure. Along the northern boundary of the Brauncewell Quarry, the land is proposed for solar PV's. The safeguarding report states that this form of development would not impact operations of the quarry as the proposed development is reversible, and after 40 years, the land would be returned to its existing use. At this point, the existing mineral sites could be expanded if permitted, and the limestone mineral resources would not be sterilised or jeopardised by the adjoining proposed land use.

18.11 In relation to mineral resource safeguarding and the requirements of policy M11, it is noted that the majority of the development site is located in the MSA. This would include areas of solar PV arrays, the Springwell substation and BESS, the cable route corridor as well as the proposed Navenby Substation. The potential for mineral sterilisation is therefore significant, albeit temporary in nature. We would like to stress that although the development is considered to be temporary, 40 years is a significant duration, and further applications could come forward to extend this timeframe.

18.12 In terms of the need for Limestone, the latest draft Lincolnshire Local Aggregate Assessment (reporting 2023 data) states that "*Sales of limestone aggregate in 2023 amounted to 1.399mt, a decline from 2022 but still significantly higher than the latest 10-year average (1.061mt). Sales remain high following sustained growth in recent years, with the three-year average sales figure of 1.432mt representing a 35% increase over the 10-year average.…the permitted reserves of limestone (14.037mt) at the end of 2023 provides a landbank of 9.8 years*[15] *."*

18.13 The Lincolnshire Minerals and Waste Local Plan is being updated and additional reserves will be required to cover the proposed new plan period up to 2041. Work on the plan is progressing, with consultation carried out in Summer 2024 on the preferred approach to updating the plan. The preferred approach consultation

[15] Lincolnshire Local Aggregate Assessment - Draft Version January 2025 (reporting 2023 data)

document identifies several 'preferred' sites to meet identified requirements. The outcome of the preferred approach consultation will inform the next stage of the plan-making process which will be a further 6-week consultation on a final 'proposed submission' draft of the new plan, in advance of the formal public examination process.

18.14 The proposed 40 year operational life of the proposed development would however extend significantly beyond the proposed plan period for the updated LMWLP and further limestone resources are therefore likely to be required during the life of the proposals, beyond any that may be identified in the new plan.

18.15 Given the nature and scale of the proposals we acknowledge that it would not be possible to completely avoid sterilisation of some mineral resources. However, we have specific concerns in relation to proposals being located immediately adjacent to Brauncewell and Longwood Quarries as they could potentially sterilise mineral resources in land next to these sites that may otherwise have a reasonable prospect of being considered for extraction within the next 40 years. This should be given more meaningful consideration as part of the DCO application. In the absence of the applicant undertaking any detailed assessment of the mineral resources in these areas to demonstrate otherwise, it has to be assumed that there are viable mineral resources in proximity to these sites.

18.16 It is acknowledged that the applicant has also put forward an argument regarding the overriding need for the project, in line with the criteria set out under Policy M11. However part of this test requires that the development could not reasonably be sited elsewhere, and we consider that further information is required to demonstrate that the second part of this test has been met. Can justification be provided for example for why the footprint of the proposed development could not be amended and set further back from the identified quarries to avoid sterilising the land in their immediate proximity for at least the next 40 years?

18.17 Furthermore, whilst it is noted that the majority of the land around the two quarries is proposed for green infrastructure, has consideration been given to whether such landscape and biodiversity enhancements may present a constraint to any future mineral extraction in these areas?

18.18 In light of the above, only if the applicant is able to address the points raised and therefore demonstrate full compliance with Policy M11, and subject to requirement 19 in the draft DCO [APP-012] specifying the date of decommissioning to be no later than 40 years following the final date of commissioning, the Council would not object to the proposal on mineral resource safeguarding grounds. With regard to Policy M12 and the safeguarded mineral sites, the Council are of the view that insufficient information has been provided in the assessment undertaken to demonstrate that the proposed development would not prejudice or detrimentally impact upon the operation of the safeguarded sites. Relevant issues to consider may include (but are not limited to):

- access and highways;
- health and safety (including fire safety);
- screening/boundary treatments;
- dust;
- site buffers; and
- the need to protect any associated utilities and infrastructure, etc.

18.19 The Council suggest contacting the site operators and relevant experts such as the Health and Safety Executive, the Environment Agency and local Environmental Health Officers to accurately determine the detailed matters that should be considered and any necessary mitigation. At this stage, the Council has not seen any evidence that such engagement has been undertaken and would wish to see further evidence to confirm that such engagement has taken place, and a satisfactory outcome achieved.

18.20 As discussed in paragraph 8.18 above, in the absence of satisfactory information to the contrary the current assessment of impact on minerals would be **negative.** The Council will review this position once the applicant has provided further information in order to demonstrate that the proposed development would not prejudice or detrimentally impact upon the operation of the safeguarded sites.

Waste

18.21 NPS EN-1 states at paragraph 5.15.4 that "*All large infrastructure projects are likely to generate hazardous and non-hazardous waste. The EA's Environmental Permitting regime incorporates operational waste management requirements for certain activities. When an applicant applies to the EA for an Environmental Permit, the EA will require the application to demonstrate that processes are in place to meet all relevant Environmental Permitting requirements.*"

18.22 Paragraphs 5.15.14 and 5.15.15 of NPS EN-1 outline that during decision making consideration should be given to the extent the Applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction operation and decommissioning of the proposed development. Waste should be properly managed, both on-site and off-site and can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Waste arisings should not have an adverse effect on the capacity of existing waste management facilities and steps should be taken to minimise the volume of waste arisings.

18.23 The Council has reviewed the application in respect of waste matters and whilst waste has been scoped out of the ES as a separate chapter, Chapter 3: Proposed Development Description of the ES [APP-043] sets out the arrangements that are proposed for managing any waste produced by the development, following the waste hierarchy. More specific measures are set out in the outline CEMP [APP - 0140], outline OEMP [APP - 0143], outline DEMP [APP - 0146] and outline LEMP [APP -0142]. The inclusion of an outline Site Waste management Plan (oSWMP), appended to the outline CEMP, is welcomed. However, further details of expected

waste arisings, and of their proposed fate, ***from all phases of the project*** will need to be included in the final SWMP.

18.24 As with other solar NSIP's the Council has serious concerns about the lack of current capacity for recycling solar panels, particularly at decommissioning but also with operational failures, weather related impacts (note the impact of Storm Darragh on the Porth Wen Solar Farm on Anglesey) and the cumulative impacts alongside other proposed NSIP-scale solar farms, particularly in terms of waste management capacity. The impact of adverse weather or other event which would require replacement of panels significantly earlier in the project lifetime would create issues given the lack of current capacity for recycling solar panels. There is no certainty that sufficient capacity for recycling solar panels will be available in 40 years' time. This has the potential to become a significant issue.

18.25 In respect of Policy W1 of the LMWLP this requires the Council to make provision for sites to meet predicted future capacity gaps for waste arisings. Currently there are no waste facilities locally to process discarded solar infrastructure as it is replaced during the lifetime of the development and at the decommissioning stage. When combined with the other solar projects in the county and region, cumulatively this will potentially present a significant issue and additional facilities to ensure these products are sustainably disposed of will be needed. The developer needs to be mindful that local facilities for recycling solar waste don't exist at present and this needs to be taken in account as part of any decommissioning plan. The ES Volume 1 Chapter 8: Climate, Table 8.5 'Service life of the Proposed Development components' assumes a 40 year lifespan for Solar PV which therefore does not take into account a potential failure rate (both individually and cumulatively alongside other solar farms) which would impact on recycling capacity and capability but also on its estimation of emissions (see 18.27 below).

18.26 The Council notes the applicant's commitment at paragraph 6.1.25 of the outline CEMP [APP-0140] that a SWMP would be prepared and agreed prior to commencement of the decommissioning phase and the requirement (19) in the draft DCO [APP-012] to submit a DEMP. However, it will be necessary for a mechanism to be incorporated that requires a waste management strategy to be submitted which demonstrates the expected quantity of solar infrastructure that would be discarded during the operational and decommissioning phases and the arrangements to be put in to ensure adequate facilities are available to sustainably dispose/recycle these items in the future.

18.27 Furthermore the Council wishes to draw the SoS attention to the point relating to not just the predicted decommissioning GHG emissions associated with the recycling or disposal of components and panels at specialist disposal facilities, but also the need for replacement infrastructure during the lifetime of the development which is unrestricted and therefore could result in the infrastructure being replaced a number of times during the lifetime of the development. The ES Chapter 8 (Climate Change) [APP-048] table 8.28.12 in assessing the operational impact on GHG emissions states 'no replacement' for solar PV's and other components, and therefore attributes a 0%

emissions, however other parts of the ES state Solar PV's would require replacement. The Council therefore currently disagrees with the conclusions at paragraph 8.8.5 of APP-048 that the overall impact on climate during the operation (including maintenance) is positive and no additional mitigation would be required as replacement has not been fully taken into account.

18.28 The Council would also welcome clarification why the 'end of life' figures shown in Table 8.13:

- Are shown as one item rather than itemised as 8.11 & 8.12 do for other phases.
- Show a figure much lower than the embodied emissions from the manufacture of components (Table 8.11).

18.29 The Council has concerns about some aspects of the Applicant's assessment and consider that further work is needed in order to adequately demonstrate that the impact of the development in terms of waste would not be significant. The Council wish to raise the following points:

- The applicant should be aware that, whilst PV panel recycling facilities may be available in time to process the quantities of waste panels generated by this project, this is by no means certain. Thus, the applicant needs to indicate what they propose to do if such capacity is not forthcoming and assess the impacts accordingly.
- Particular consideration needs to be given to the cumulative quantities of waste arising from this and other proposed large-scale solar infrastructure nearby. This includes the significant overall failure rate of PV panels during the operational phase.
- The need for a commitment that the applicant will set out, and regularly review, their forecasts for, and proposed fate of, all wastes arising in each phase of the project – Commissioning, operational and decommissioning.

18.30 On the basis of the above and until such time as the applicant can provide further information, the Council consider the development would have a **negative** impact in terms of waste. The Council would be happy to engage further with the Applicant regarding these matters, including through the SoCG.

19. Cumulative Effects

19.1 The EIA Regulations at Schedule 4 require that an ES should include *"a description of the likely significant effects on the environment resulting from, inter alia, (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources."*

19.2 NPS EN-1 in section 4 (Assessment Principles), paragraph 4.1.5 states "*In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: its potential adverse impacts, including on the environment, and including any long-term and cumulative*

adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy."

19.3 Whilst the development plan for the area does not contain any specific stand-alone policies for the consideration of cumulative impacts, CLLP Policy S14 (Renewable Energy) is of relevance for this proposal as it requires cumulative impacts to be taken into consideration when considering the acceptability of development proposals.

19.4 Policy S14 (Renewable Energy) outlines proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect and cumulative impacts on the following considerations are, or will be made acceptable. The following tests will have to be met:

(i) The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their settings and the historic landscape; and highway safety and rail safety; and
(ii) The impacts are acceptable on aviation and defence navigation system/communications; and
(iii) The impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic.

19.5 The Applicant's assessment of cumulative effects is set out ES Chapter 16 [APP-056] and considers both in combination effects (intra-project) and inter-project effects with other development as a result of the development. For inter-project effects, the Applicant's assessment considers those projects that are existing or approved (tier 1 projects), in line with the Planning Inspectorate's Advice Note Seventeen: cumulative effects assessment, with an overall combined 'search area' of 10 km. However, a wider study area for cumulative assessment in relation to BMV agricultural land and transport has been adopted. The assessment also considers (tier 2 projects) which includes projects under construction, projects with planning permission within the last 5 years, submitted applications but not determined and projects where an EIA scoping opinion has been submitted to the Planning Inspectorate.

19.6 Other NSIP scale solar proposals are coming forward in the NKDC area. Leoda Solar Farm has commenced non-statutory consultation and submitted a EIA scoping request since the Applicant completed their ES. The Council will therefore expect to see the applicant's cumulative assessment updated accordingly to include this proposal.

19.7 The nature and scale of current and emerging proposals relating to large scale solar developments in Lincolnshire is unprecedented. At the time of writing this report 5 NSIP scale solar schemes have been granted a DCO in Lincolnshire and a further 7 schemes that are either progressing through examination or are at pre application stage.

19.8 Similar to what has been seen in the western part of Lincolnshire around Gainsborough, there is also now a potential for a cluster of NSIP solar developments centred around the Navenby area in North Kesteven district. Springwell, Fosse Green and Leoda solar schemes are all seeking to connect to the proposed Navenby substation. The cumulative impacts of the Springwell solar farm, combined with the other developments identified as part of the cumulative assessment could be significant. These impacts include landscape and visual effects, construction-related traffic and transport movements, and the long-term loss of BMV agricultural land. Such changes are likely to negatively affect the local community's amenity. The assessment of inter-project cumulative effects therefore should be kept under review as these other projects progress through the DCO process and more information becomes available.

19.9 As part of the cluster of NSIPs centred around Navenby, Springwell and Leoda are virtually contiguous running from east to west across North Kesteven District centred on Navenby with Fosse Green to the north west of Navenby. The cumulative impact across the wider landscape on conservation areas, the collective value of historic farmsteads, designated and non designated heritage assets and the settings of this heritage both individually and collectively is significant. Historic structures act as a focal point in countryside views, providing a major contribution to environmental quality, with the landscape setting forming a major part of their significance. The context of this heritage would be severely impacted over a significant area and amount of time by the clustering of solar farms.

19.10 The development's cumulative landscape and visual effects could significantly impact the landscape character at national, county, and regional levels. The combined mass and scale of these projects may lead to adverse effects over a large area, altering the predominantly agricultural landscape. This change would be noticeable to visual receptors traveling through the area, experiencing the schemes sequentially across several kilometres.

19.11 The Council are also concerned about the cumulative impact of development, particularly large scale solar development, on agricultural land as described in chapter 15 above and the impact from waste arisings from solar development and the lack of existing waste capacity as described in chapter 18 above. The waste arisings from these proposals combined both during the operational and decommissioning phases is potentially significant.

19.12 The potential for significant inter-projects effects to arise from this development in combination with other developments is of particular concern and as such the Council's position on cumulative impacts in the overall balance is **negative**. The Council will make further comments on the potential cumulative impact of the development with other NSIP proposals as further information on the other projects comes forward.

19.13 The Council in its Relevant Representation put forward a request that the ExA adopt a mechanism as supported by the ExAs for the solar projects in western Lincolnshire

(Cottam, Gate Burton, West Burton and Tillbridge) and also for the Outer Dousing offshore wind proposal in the east of the County, where each applicant was required to produce an inter- relationship report at the start of their examination and then subsequently updated at each deadline during the examination. For the reasons set out above the Council would wish to see a similar approach adopted for the Springwell proposal and subsequently for the other solar proposals identified as forming a cluster around the proposed Navenby substation. The applicant's commitment to the production of an interrelationship report at ISH1 is therefore welcomed.

20. Fire Safety

20.1 Key Policies:

- CLLP Policy S21: Flood Risk and Water Resources
- CLLP Policy S53: Design and Amenity
- CLLP Policy S54: Health and Wellbeing

20.2 Part (7) of CLLP policy S53 'Design and Amenity' requires development to avoid adverse impacts associated with noise, dust and air quality, and part (9) requires schemes to minimise the need for resources both in construction and operation of buildings and be easily adaptable to avoid unnecessary waste production. One of the 15 objectives of the CLLP as set out in paragraph 1.5.2, under the heading of 'Waste' is 'To minimise the amount of waste generated across all sectors and increase the reuse, recycling and recovery rates of waste materials'.

20.3 Policy S54 seeks to ensure that where any potential adverse health impacts are identified the developer will be expected to demonstrate how these will be addressed and mitigated.

20.4 No specific chapter in the ES is dedicated to the impact of fire. The impacts of major accidents and disasters are however considered within the ES Volume 1, Chapter 15: Water [APP-055] which includes basic information on water tanks and supply, and BESS design and surface water discharge of fire water and BESS Plume Assessment [APP-0152]. An Outline Battery Management Safety Plan [APP-0147] and Draft SoCG [APP-0157] between the Applicant and Lincolnshire Fire Service have also been submitted as part of the examination documentation.

20.5 In recognition of the emerging technology of Battery Energy Storage Systems (BESS) and the challenges this poses to Fire and Rescue Services the National Fire Chiefs Council circulated a letter to all Chief Fire Officers on the 22 August 2023 drawing attention to the updating of Renewable and Low Carbon Energy Planning Policy

Guidance that was updated in August 2023 by the Department of Levelling Up, Housing and Communities to include reference to BESS[16].

20.6 The planning policy guidance encourages planning authorities to consult with their local Fire and Rescue Service as part of formal planning consultations and directs developers to the National Fire Chiefs Council guidance on BESS schemes. From discussion with Lincolnshire Fire Service (LFR) who have developed standing advice for BESS[17] based on national guidance, a program of monitoring and risk assessment has been identified as necessary once the BESS has been established to ensure it complies with the Outline Battery Management Safety Plan [APP-0147] and Emergency Response Plan. During the first year of operation this will involve 21 days of work for the Fire Service and then two days in each subsequent year for the lifetime of the development.

20.7 The need for this monitoring and assessment will enable early engagement to ensure the required standards are being complied with; to ensure the BESS is constructed to the correct standards with support from the Fire Service; early development of emergency response plans; familiarisations of the BESS for local fire crews and overview by the Fire Service; development of on-going maintenance and updating risk information; and assurance for local residents and communities that the BESS are being independently inspected and monitored to reduce the risk of a fire.

20.8 To enable the Fire and Rescue Service to undertake the necessary monitoring to ensure the BESS is in accordance with the relevant requirement (currently 7 of the draft DCO [APP-012]) a financial contribution is required via a Protective Provision within the DCO for the Fire Service so that it has sufficient resources in place to undertake monitoring of the BESS connected to this project. This approach has been agreed as part of the recently approved Gate Burton, West Burton and Cottam DCO, therefore there is a precedent for this approach to be followed for this application.

20.9 The applicant has actively engaged with the LFR throughout the pre-application stage and has no further comments to make at this stage. LFR service wish to continue to be engaged, and views sought during the examination and through the Statement of Common Ground (SOCG).

Outline Battery Management Plan

20.10 Lincolnshire Fire and Rescue (LFR) Service have reviewed the draft Outline Battery Safety Management Plan [APP - 0147] and are satisfied with the detail provided at this stage and with the explanations of how the developer aims to mitigate possible incidents occurring and defined measures applicable. The information in APP- 0147 accords with correspondence between the LFR and the developer to date and

[16] Planning Practice Guidance: Renewable and low carbon energy: Paragraph: 032 Reference ID: 5-032-20230814 to Paragraph: 036 Reference ID: 5-036-20230814

[17] Battery Energy Storage Systems (online)

evidences that the advice of LFR has been taken into account, such as in regard to access to site for fire appliances, distance between units and additional water tanks. LFR are satisfied that the examples used would ensure compliance to guidance, and they would expect to see the final design to accord with these details. The LFR would welcome the opportunity to review the final design details and an opportunity to visit site during construction.

21. Other topics

21.1 The Council may wish to make further representations as appropriate during the examination and at issue specific hearings relating to matters that are not contained within this LIR. Therefore, the comments contained above are provided without prejudice to the future views that may be expressed by the Council in its capacity as an Interested Party in the examination process.

22. Draft Development Consent Order

22.1 In addition to the comments provided under the relevant topic chapters above in respect of the draft DCO [APP-012], at this stage the Council wishes to raise the following additional points:

DCO ref:	Reason	Suggested amendment/wording
Part 3 (Streets), Articles 8 and 10	As currently written these Articles would give the developer the right to undertake works with no further approvals from the Council. At this stage, the technical details have not been submitted or approved. The Council require major works to be delivered via a Section 278 process (or equivalent agreement) which would also for consideration of detailed design and allow for the provision of a bond which, if the developer was unable to complete the works, the Council would be able to make the Highway safe.	Replace Draft DCO Part 3 (Streets), Articles 10 (4) with West Burton DCO Part 3 Article 9 (4) 'Power to alter layout, etc., of streets' *(4) The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority."*
Part 6 (Miscellaneous and General), Article 40	As currently written Article 40 allows for the felling, lopping or cutting back of roots of any tree near any part of the development if believed to be necessary (excluding highways hedgerows and trees which require prior consent of the highway authority). This power is considered to be excessive. As the detailed design is not provided as yet under the Rochdale Envelope the impact on trees is unknown, therefore a blanket power could cause significant impact. It is noted that the Arboricultural Impact Assessment [APP-093] states at paragraph 6.1.1 'Once	It is suggested that a detailed Arboricultural Method Statement (AMS) which includes an updated schedule of trees to be removed should be included as part of the Construction Environment Management Plan (CEMP). The outline CEMP is currently included at Schedule 13 of the draft DCO, and should be updated to include a reference to the provision of an AMS.

	the construction details are provided, a detailed AMS should be compiled, detailing the exact location and nature of protective fencing, tree pruning, signage, timings and methods of works and other protection measures.' Some hedgerows and hedgerow trees are identified for removal in Table 2 of that report and at Schedule 12 of the draft DCO but no acknowledgement is made for trees. Given that there could be significant further losses to the environment on the basis of the current lack of detailed design, the Council would wish to see this power linked and an Arboricultural Method Statement which includes an updated schedule of trees to be removed and which will be included as part of the Construction Environment Management Plan. This would bring this element of the project into line with the approach to the ecological and archaeological elements of the project where post consent approvals are required. It is not appropriate for this power to be included on a precautionary basis The blanket power for the removal of trees would also not allow for BNG loss to be calculated appropriately using the Defra	

	metric, as the trees to be removed are an unknown quantity and quality.	
Part 6 (Miscellaneous and General), Article 41	As currently written Article 41 provides deemed consent to fell, lop or cut back of roots of any tree subject to a TPO where the TPO was made after November 2024. Advice Note 15, section 5.8.22, para 22.2 states: '*Applicants may also wish to include powers allowing them to fell, lop or cut back roots of trees subject to a Tree Preservation Order (TPO). This power can extend to trees which are otherwise protected by virtue of being situated in a conservation area. To support the ExA, inclusion of this power should be accompanied by a Schedule and plan to specifically identify the affected trees*.'	According to the Arboricultural Impact Assessment report (APP-093) there are currently no TPOs within the boundary (1.6.4). The report does identify quite a few Grade A trees / groups either within or near the boundary that may over the course lifetime of the site come to be worthy of TPO consideration. The Council therefore consider it would be appropriate for the article to be amended to require consultation with the relevant planning authority prior to the removal of any trees that may become subject to a TPO in the future. There should also be an expectation of replacement of any TPO tree removed, and an obligation that the relevant planning authority Tree Officer should be informed where any tree subject to a post November 2024 TPO is pruned/ felled, to allow records to be updated. The ExA is referred to the wording of article 40 for The A38 Derby Junctions DCO 2023 which provides for consultation with the relevant planning authority and seeks to ensure replacement of felled TPO trees. Suggested wording for article 41(2): (2) In carrying out any activity authorised by paragraph (1)— (a) the undertaker must do no unnecessary damage to any tree or shrub and must pay compensation to any person for any loss or damage arising from such activity; (b) the duty contained in section 206(1)(a) (replacement of trees) of the 1990 Act is not to apply although where possible the undertaker is to seek to replace any trees which are removed; and

		(c) the undertaker must consult the relevant planning authority prior to that activity taking place
Schedule 2 (Requirements), Article 1 (vi) Requirement 18 (Soil Management Plan)	The Council would defer to North Kesteven District Council for the discharge of this requirement	
Schedule 2 (Requirements), Requirement 11 (Archaeology) (1)	Requirement 11 (Archaeology) (1) currently states: 'No part of Work Nos. 1 to 6 may commence until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority.' This implies works 7 to 9 can commence without a WSI. It would be expected that a site wide WSI would be provided, as operations contained in Work No. 7 including 7A and 7B (temporary construction compounds), Work No.8 (works to facilitate access), and Work No. 9 (works to create, enhance and maintain green infrastructure and mitigation) could potentially impact on archaeology.	Proposed wording as taken from Mallard Pass, Cottam and West Burton approved DCOs: (1) The authorised development may not commence until: (a) a scheme for additional trial trenching has been submitted to and approved by both relevant planning authorities, in consultation with Lincolnshire County Council and Historic England; (b) additional trial trenching has been carried out in accordance with the scheme approved under sub-paragraph (a); and (c) updates are made to the outline written scheme of investigation to account for the results of the additional trial trenching carried out and the updated outline written scheme of investigation is submitted to and approved in writing by both relevant planning authorities in consultation with Lincolnshire County Council and Historic England. (2) The authorised development must be carried out in accordance with the updated outline written scheme of investigation approved under sub-paragraph 1(c).
Schedule 2 (Requirements), Requirements 3, 4, 5 and 19	The Council would wish to be a consultee on these requirements.	

Schedule 16 (Procedure for Discharge of Requirements Article 2 (1)	Further information and Consultation, (3) requires the relevant authority to notify the undertaker of any further information that is considered necessary or that is requested by the requirement consultee within 15 working days of receipt. (6)(a) requires that a requirement consultee should provide comments on an application to the relevant planning authority within 10 working days of receipt.	Due to the capacity and availability of consultees, it is requested that (3) is extended to 20 working days and (6)(a) to 15 working days.
Schedule 16 (Procedure for Discharge of Requirements Article 5 (Fees)	The Council consider that the fee schedule should be update to reflect the fees due to be introduced in April 2025 and requests that a proportionate increase is reflected in the fees set out in Schedule 16.	5. (1) Where an application is made to the relevant planning authority for a discharge, a fee is to apply and must be paid to the relevant planning authority for each application. (2) The fee payable for each application under sub-paragraph (1) is as follows— (a) a fee of £2,578 for the first application for the discharge of each of the requirements 5, 7, 8, 10, 12, 13, 14, 18 and 19; (b) a fee of £588 for each subsequent application for the discharge of each of the requirements listed in paragraph (a) and any application under requirement 5 in respect of the requirements listed in paragraph (a); and (c) a fee of £298 for any application for the discharge of— (i) any other requirements not listed in paragraph (a); (ii) any application under requirement 4 in respect of requirements not listed in paragraph (a); and (iii) any approval required by a document referred to by any requirement or a document approved pursuant to any requirement.

Schedule 15	There is currently no Protective Provision for The Protection of Lincolnshire Fire and Rescue included within the DCO.	Heckington Fen approved DCO Schedule 13 Part 9, para 104 to 107 includes appropriate wording. FOR THE PROTECTION OF LINCOLNSHIRE FIRE AND RESCUE **Interpretation** 104.— (1) For the protection of Lincolnshire Fire and Rescue as referred to in this Part of this Schedule the following provisions have effect, unless otherwise agreed in writing between the undertaker and Lincolnshire Fire and Rescue. (2) In this Part of this Schedule— "Index Linked" means an increase in the sums payable on an annual basis or pro rata per diem in accordance with the most recent published figure for the Consumer Price Index, or during any period when no such index exists the index which replaces it or is the nearest equivalent to it; and "Lincolnshire Fire and Rescue" means Lincolnshire County Council in its capacity as a fire and rescue authority pursuant to section 1(2)(a) of the Fire and Rescue Services Act 2004. **Site visits** 105.— (1) The undertaker must, prior to the date of final commissioning of Work No. 2, use reasonable endeavours to facilitate a site familiarisation exercise in connection with Work No. 2 of the authorised development for Lincolnshire Fire and Rescue for the purposes of providing the necessary assurance to Lincolnshire Fire and Rescue that all the required systems and measures are in place in accordance with the battery safety management plan.

		(2) Following the first anniversary of the date of final commissioning of Work No. 2 of the authorised development, the undertaker must use reasonable endeavours to facilitate an annual review of Work No. 2 by Lincolnshire Fire and Rescue at the reasonable request of Lincolnshire Fire and Rescue, up until the year in which the undertaker commences decommissioning of Work No. 2. **Costs** 106.— (1) Pursuant to the provisions set out at paragraph 105, the undertaker must pay to Lincolnshire Fire and Rescue— (a) £16,665 in the first year of operation of the authorised development for, or in connection with Lincolnshire Fire and Rescue's attendance at the site familiarisation exercise facilitated by the undertaker pursuant to paragraph 105(1), such sum to be paid within 30 days following the date of the site familiarisation exercise; and (b) £1,530 in each subsequent year of operation of the authorised development until the date of decommissioning of Work No. 2, such sums to be paid within 30 days of the date of the annual review for that year, if in that year an annual review has taken place pursuant to paragraph 105(2). (2) The costs payable under this sub-paragraph (1)(b) are to be Index Linked. **Arbitration** 107. Any difference or dispute arising between the undertaker and Lincolnshire Fire and Rescue under this Part of this

		Schedule must be determined by arbitration in accordance with article 38 (arbitration).
Schedule 2 (Requirements), Requirement 20	The Council considers that a specific requirement relating to Biodiversity Net Gain should be included in the DCO. Relevant percentages should be added when the Applicant has updated its BNG calculations as part of the design process.	Proposed BNG Requirement 1. The authorised development may not commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body. 2. The biodiversity net gain strategy must include details of how the strategy will secure a minimum of xx% biodiversity net gain in area habitat units and a minimum of yy% in hedgerow units and zz% in watercourse units for all of the authorised development during the operation of the authorised development, and the metric that has been used to calculate that those percentages will be reached. 3. The biodiversity net gain strategy must be substantially in accordance with the outline landscape and ecological management plan and must be implemented as approved and maintained throughout the operation of the authorised development to which the plan relates.

22.2 The Council has engaged further discussions with the applicant regarding these matters since the submission of the DCO application and will be happy to engage in further discussions throughout the examination and through the SoCG.

Appendix A

Landscape and Visual Review of the Development Consent Order (DCO) Application for Springwell Solar

LANDSCAPE AND VISUAL REVIEW

OF THE DEVELOPMENT CONSENT ORDER (DCO) APPLICATION

FOR THE SPRINGWELL SOLAR PROJECT

FOR

LINCOLNSHIRE COUNTY COUNCIL

&

NORTH KESTEVEN DISTRICT COUNCIL

May 2025

Landscape and Visual Review

Quality Assurance – Approval Status

Version	Date	Prepared by	Checked by	Approved by	Version Details
1	31/01/25	Oliver Brown	John Brodie	Oliver Brown	Draft Issued for comment
2	19/05/25	Oliver Brown	John Brodie	Oliver Brown	Issued for LIR

Landscape and Visual Review

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7.0 Mitigation and Design 27

8.0 Conclusions and Recommendations 30

Appendices:

Appendix A: Previous AAH Consultation documents:

- AAH TM01 Landscape and Visual Scoping Opinion 14th April 2023
- AAH TM02 Initial Viewpoint Comments 29th June 2023
- AAH TM03 Viewpoint Comments 15th August 2023
- AAH TM04 PIER Comments 19th February 2024
- AAH TM05 Viewpoint Comments 10th July 2024

Appendix B: Landscape Institute Technical Guidance Note 1/20 (10 Jan 2020)
: *Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs).*

1.0 Introduction

Purpose of the Landscape and Visual Review

1.1 AAH Consultants (**AAH**) has been commissioned to prepare a review of the Landscape and Visual elements of the Development Consent Order (**DCO**) Application for the Springwell Solar Project (the '**Development'**), submitted to the Planning Inspectorate in November 2024 and accepted for Examination in December 2024, on behalf of Lincolnshire County Council (**LCC**) and North Kesteven District Council (**NKDC**). This follows on from AAH providing landscape and visual consultation with the applicant on behalf of LCC and NKDC at the Pre-Application stage of the project. AAH pre-application correspondence (in the format of Technical Memos) is provided within **Appendix A**.

1.2 The purpose of this report is to carry out an independent review of the landscape and visual elements of the DCO submission, with a focus on a review of the Landscape and Visual Impact Assessment (**LVIA**) chapter of the Environmental Statement (**ES**), which is based on the guidance provided within the Landscape Institute *Technical Guidance Note 1/20 (10 Jan 2020): Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)*, which is included within **Appendix B** for reference.

1.3 This report will be utilised to inform and guide LCC and NKDC input into further stages of work through the Examination of the application, which is for a Nationally Significant Infrastructure Project (**NSIP**). This will include input into Local Impact Reports (**LIR**) and Statements of Common Ground (**SoCG**), as well as formal requests for information or responses to examiners questions that may be required through the Examination or at any associated hearings.

About AAH Planning Consultants and The Author

1.4 AAH Consultants comprises professional and accredited individuals. Our consultants are Chartered Members of the Landscape Institute (**CMLI**) and the Royal Town Planning Institute (**RTPI**).

1.5 This review has been prepared by Oliver Brown, who is a Chartered Landscape Architect within AAH with over 20 years' experience in landscape design and assessment, and

considerable experience in landscape and visual matters associated with solar NSIP and associated DCO Applications.

Relevant Documents

1.6 The Landscape and Visual review is based on the following documents (including sub-appendices) submitted to the Planning Inspectorate, which are available at: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010149/documents

Information downloaded and initially reviewed is as follows (which include any associated sub-appendices):

- **3.1 Draft Development Consent Order**

- **Plans / Drawings / Sections**
  - 2.1 Location, Order Limits Grid Coordinate Plans
  - 2.3 Work Plans
  - 2.5 Illustrative Layout Plans and Sections

- **Environmental Statement Volume 1**
  - 6.1 Environmental Statement Volume 1 Chapter 00: Glossary
  - 6.1 Environmental Statement Volume 1 Chapter 1: Background and Context
  - 6.1 Environmental Statement Volume 1 Chapter 2: Location of the Proposed Development
  - 6.1 Environmental Statement Volume 1 Chapter 3: Proposed Development Description
  - 6.1 Environmental Statement Volume 1 Chapter 4: Reasonable Alternative Considered
  - 6.1 Environmental Statement Volume 1 Chapter 5: Approach to the EIA
  - 6.1 Environmental Statement Volume 1 Chapter 10: Landscape and Visual
  - 6.1 Environmental Statement Volume 1 Chapter 16: Cumulative Effects
  - 6.1 Environmental Statement Volume 1 Chapter 17: Mitigation Schedule

- **Environmental Statement Volume 2**
  - 6.2 Environmental Statement Volume 2: Figures Chapter 1: Background and Context 1.1-1.2
  - 6.2 Environmental Statement Volume 2: Figures Chapter 2: Location of the Proposed Development
  - 6.2 Environmental Statement Volume 2: Figures Chapter 3: Proposed Development Description
  - 6.2 Environmental Statement Volume 2: Figures Chapter 5.1: Approach to the EIA
  - 6.2 Environmental Statement Volume 2: Figures Chapter 10: Landscape and Visual
  - 6.2 Environmental Statement Volume 2: Figures Chapter 16: Cumulative Effects

- **Environmental Statement Volume 3**
  - 6.3 Environmental Statement Volume 3 Appendix 1.1: Statement of Competence
  - 6.3 Environmental Statement Volume 3 Appendix 3.1 – Project Parameters
  - 6.3 Environmental Statement Volume 3 Appendix 5.4 Glint and Glare Study
  - 6.3 Environmental Statement Volume 3 Appendix 7.11: Important Hedgerow Survey

- 6.3 Environmental Statement Volume 3 Appendix 7.12: Arboricultural Impact Assessment
- 6.3 Environmental Statement Volume 3 Appendix 10.1: Landscape and Visual Methodology and Assessment Criteria
- 6.3 Environmental Statement Volume 3 Appendix 10.2: Baseline Landscape Character Appraisal
- 6.3 Environmental Statement Volume 3 Appendix 10.3: Landscape Sensitivity Appraisal
- 6.3 Environmental Statement Volume 3 Appendix 10.4: Viewpoint Analysis
- 6.3 Environmental Statement Volume 3 Appendix 10.5: Residential Visual Amenity Assessment

- **Environmental Statement Volume 4**
  - 6.4 Environmental Statement Volume 4 Landscape Visualisations Part 1
  - 6.4 Environmental Statement Volume 4 Landscape Visualisations Part 2
  - 6.4 Environmental Statement Volume 4 Landscape Visualisations Part 3
  - 6.4 Environmental Statement Volume 4 Landscape Visualisations Part 4
  - 6.4 Environmental Statement Volume 4 Landscape Visualisations Part 5
  - 6.4 Environmental Statement Volume 4 Landscape Visualisations Part 6
  - 6.4 Environmental Statement Volume 4 Landscape Visualisations Part 7
  - 6.5 Environmental Statement Volume 5 Non-Technical Summary

- **Other Documents**
  - 7.2 Planning Statement
  - 7.3 Design Approach Document
  - 7.4 Design Commitments
  - 7.7 Outline Construction Environmental Management Plan
  - 7.9 Outline Landscape and Ecology Management Plan
  - 7.10 Outline Operational Environmental Management Plan
  - 7.11 Outline Soil Management Plan

Please note: this review is of the information available at the time of writing. Throughout the pre-examination and examination process additional information will be submitted, including updates and amendments to some of the documents listed above.

Previous Consultation

1.7 As part of the DCO process, as stipulated by *The Planning Act 2008* (**PA2008***)*, AAH have carried out pre-application landscape and visual consultation with the applicant and relevant members of their design team, on behalf of LCC, and NKDC over approximately a 12-month period. This has included discussion and consultation on:

- Expectations of the LVIA, including content and reflection of current best practice and guidance
- LVIA Methodology;
- ZTV parameters;

- Study Area extents (distance);
- Viewpoint quantity and locations;
- Accurate Visual Representations (**AVR**s), including the quantity and location, as well as type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative landscape and visual effects, including identification of sites/projects; and
- Residential Visual Amenity Assessment (**RVAA**) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

1.8 Section 10.3 and Table 10.1 of the LVIA summarises relevant consultation carried out, and for landscape and visual matters, AAH have subsequently issued five Technical Memos (**AAH TMs**) summarising comments and consultation through the Pre-application period, including a focus on proposed viewpoints, and review of the Preliminary Environmental Information Report (**PEIR**). For reference, the AAH Technical Memos from the Pre-Application stage are included within **Appendix A**.

2.0 Presentation of the LVIA

The following section provides a review of the presentation of the LVIA, based on the following criteria (where applicable):

- *Is the LVIA appropriate and in proportion to the scale and nature of the proposed development;*
- *Are findings of the assessment clearly set out and readily understood;*
- *Is there clear and comprehensive communication of the assessment, in text, tables and illustrations;*
- *Are the graphics fit for purpose and compliant with other relevant guidance and standards; and*
- *Are landscape and visual effects considered separately;*
- *Are receptors and all likely effects comprehensively identified;*
- *Does the LVIA display clarity and transparency in its reasoning, the basis for its findings and conclusions; and*
- *Is there a clear and concise summation of the effects of the proposals.*

LVIA Chapter

2.1 The LVIA and associated figures, appendices and documents provide a thorough analysis of landscape and visual effects of the Development, and the level of information and detail is appropriate for the scale and type of development. The assessment is detailed and laid out in a logical manner, and the process of assessment is thorough and well explained. It has been carried out to best practice and guidance, primarily the *Guidelines for Landscape and Visual Impact Assessment (GLVIA3)* by the *Landscape Institute*, by a team of competent Chartered Landscape Architects.

2.2 The LVIA clearly draws a distinction between **landscape effects** and **visual effects**, with the main chapter focussing on likely **'significant'** effects. Paragraph 1.7.2 of Appendix 10.1

clarifies *major* or major/*moderate* effects generally being considered **'significant'**. Paragraph 1.7.3 of Appendix 10.1 clarifies *moderate/minor, minor, minor/negligible* or *negligible* significance are considered to be not significant. Paragraph 1.7.4 clarifies professional judgement is applied in regards to *moderate* effects being significant, or not. This is aligned with standard practice and is typical for LVIAs, however we would generally assume *moderate* effects would be considered significant, and the author would justify as to the reasoning as to why any moderate effects would be considered not significant.

2.3 The LVIA presents an assessment of a 'worst case' scenario of the Development, based on design parameters presented in ES *Chapter 3: Proposed Development Description*. Section 3.2 goes on to describe the project parameters that the LVIA have assessed, and clarifies in para. 3.2.6. that *"the Applicant intends to use the 'Rochdale Envelope' approach to assessing the impacts of the Proposed Development within the maximum parameters set out in this ES".* Paragraph 10.4.7 of the LVIA clarifies that the assessment of landscape and visual effects has assumed the worst-case scenario in regards to assessing the maximum parameters, with Table 10.4 laying out the reasonable 'worst case' scenarios for each project element. This includes an assumption that all vegetation proposed to be removed on the *Vegetation Removal Parameters* drawings would be removed. However, if proposed mitigation areas and existing retained vegetation proposals are changed in later, detailed design stages, the findings of the LVIA are likely to also change. Landscape mitigation, and vegetation retention and protection, needs to be clarified and guaranteed as the assessment relies heavily upon it to mitigate the effects of the Development.

2.4 The LVIA assesses landscape and visual effects at the main phases: **construction; operation** and **decommissioning**, with operation phase considered with and without mitigation (year 1 effects and year 10 effects). The main phases are detailed within the section of *Chapter 5* on Assessment Scenarios (Paragraph 5.7.18). The LVIA considers the scheme in isolation, and *Chapter 16* of the ES (from paragraph 16.6.11 to 16.6.45) considers the scheme **cumulatively** with similar type and scale schemes in the local area (notably the National Grid Navenby Substation scheme, proposed within the northern part of the DCO order limits for Springwell). Although these are schemes in close proximity, and cumulative landscape and visual effects at a wider character area are not fully considered.

LVIA Appendices

2.5 The Appendices produced as part of the LVIA provide very detailed supporting information relating to the assessment. The appendices are clearly laid out and easy to follow and locate pertinent detailed information relating to the main chapter. The appendices are listed within section 10.1.3 of the LVIA, and are referenced throughout the report to support the findings and provide additional information.

LVIA Figures

2.6 The Figures produced as part of the LVIA are appropriate in the level of detail provided and clarity of information presented. The figures are clearly listed within section 10.1.2 of the LVIA, and are referenced throughout the report to support and illustrate the findings.

3.0 Methodology and Scope

The following section provides a review of the LVIA Methodology based on the following criteria (where applicable):

- *Has the LVIA been prepared by 'competent experts';*
- *Is the methodology in accordance with relevant guidance and meets the requirements of the relevant Regulations;*
- *Does the methodology and scope of the LVIA meet the requirements agreed in discussions at the pre-application stage during scoping and consultation;*
- *Has the methodology been followed in the assessment consistently;*
- *Are the levels of effect clearly defined, and have thresholds and approach to judging significance been clearly defined;*
- *Is detail about various development stages provided and appropriately assessed;*
- *Have cumulative landscape and visual effects been addressed.*

LVIA Methodology

3.1 The LVIA Methodology is presented in paragraphs 10.4.38 to 10.4.52 of the LVIA and *Appendix 10.1: Landscape and Visual Methodology and Assessment Criteria*. Reference is made in section 12.4.21 to industry best practice, including GVLIA3. It clarifies in Section 12.4.22 compliance with GVLIA3 guidance by assessing both **landscape effects** and **visual effects** as interrelated but separate components.

3.2 The process and stages of assessment are clearly presented, including a baseline assessment, the detailing and review of the design, assessment of sensitivity (by assessing value and susceptibility), an assessment of magnitude of impact (in relation to size, scale, geographical extent, duration and reversibility) of the development on the baseline conditions, and a determination of the significance of effects at all phases of the scheme (construction, year 1, year 10 and decommissioning).

3.3 The study area selection and establishment are explained in detail within paragraphs 10.4.1 to 10.4.15 of the LVIA. The Study area is illustrated in Figure 10.1. The radius of the study area of 3km for elements up to 6m in height and 5km for elements up to 12m in height: these study areas are justified and appropriate and it is unlikely Significant landscape and visual effects would occur beyond these distances.

3.4 The baseline conditions have been determined following a mix of desk and field studies alongside consultation with appropriate consultees. Desk research has included the prevailing policy framework and fieldwork carried out by qualified (Chartered) and experienced landscape architects.

3.5 The methodology is clear, with section 1.4 covering landscape effects and section 1.5 covering visual effects. Paragraphs 1.4.2 (landscape) and 1.5.1 (visual) of *Appendix 10.1* clarify how the significance of landscape and visual effects are determined by combining judgements regarding the sensitivity of the receptor and the magnitude of the effect arising from the Development.

3.6 Tables within the methodology provide criteria for assessment of value, and susceptibility, and subsequently how these have been combined to provide a judgement on sensitivity. These tables provide clear indicative criteria of the assessment of landscape and visual value, susceptibility, sensitivity and magnitude of effects. The utilisation of professional judgement is promoted within the methodology, should an effect be different to that presented within the tables.

3.7 The assessment methodology has been carried through into the main assessment and used consistently.

3.8 The assumptions made on plant growth rates are generally acceptable, however we would state these are at the higher end of the scale as to what we would deem acceptable for a ten-year period: ten years being the period that residual effects have been assessed in the LVIA. We would be more comfortable with the assumed plant growth rates being more aligned with a fifteen-year period, as this would allow for a longer establishment period, and allow for any plant replacements to have been implemented and also establish should there be plant failures or lack of acceptable growth. These rates are dependent upon the

successful implementation of management plan, which is covered in further sections of this review.

ZTV Methodology

3.9 The process of modelling Zones of Theoretical Visibility (ZTVs) is described within section 1.9 of *Appendix 10.1* (paragraphs 1.9.1 to 1.9.8). The methodology and execution is acceptable.

Visualisation Methodology

3.10 The process of delivering visualisations is presented within section 1.9 of *Appendix 10.1* (paragraphs 1.9.9 and 1.9.13). which states that they were prepared in accordance with the Landscape Institute *TGN 06/19 Visual Representation of Development Proposals*. However, it is not explicit regarding what parameters the proposals have been modelled to. Therefore, it has been assumed that the photomontages have been presented to the maximum allowed parameter heights, and the proposals modelled and presented using visualisations generated with the maximum parameters provided within *Chapter 3: Proposed Development Description,* as this would provide a 'worst case' visualisation. However, this needs to be clarified.

4.0 Appraisal of Landscape Baseline and Effects

The following section provides a review of the Landscape Baseline and Effects, based on the following criteria (where applicable):

- *Has the methodology been followed in the landscape assessment?*
- *Are all landscape receptors and all likely effects comprehensively identified and assessed?*
- *Has the value and susceptibility of landscape resources been appropriately addressed and at appropriate scales (e.g., site, local, regional, and national)?*
- *Is there a clear and concise summation of the landscape effects of the proposals? and*
- *Are potential cross-over topics, such as heritage or ecology, addressed?*

Landscape Baseline

4.1 The Landscape Baseline is considered in section 10.5 of the LVIA, with Figure 10.1 illustrating the Scheme Location and Order limits. The Site covers 1,280 hectares of predominantly agricultural land.

4.2 The baseline follows the LVIA methodology and begins by identifying landscape designations and then describing the underlying landscape conditions identifying the characteristics and elements of the Site and study area. This is summarised in the LVIA chapter and further detail is provided in *Appendix 10.2*. Paragraphs 10.5.2 to 10.5.15 provide a narrative on the existing landscape baseline of the Site. The Lincoln Cliff Area of Great Landscape Value (**AGLV**) was identified at the pre-application stage as a potentially sensitive landscape to be considered, however this area is located approximately 3km to the west of Springwell West and, as clarified in Table 10.3, this was subsequently scoped out of the LVIA due to being *"no visibility of the Proposed Development from this AGLV".*

4.3 The LVIA acknowledges the gently undulating, rural and expansive character of the Site and Study area, however, it also notes that *"there are notable differences in the landscape character across the three identified parcels of land".* The LVIA also identifies that the *"landscape within Springwell West and Springwell Central is more open with limited mature*

vegetation structure whereas the landscape within Springwell East is more enclosed with more dense and established vegetation".

4.4 Published landscape character assessments are considered from paragraphs 10.5.7 to 10.5.15 and illustrated in Figure 10.2, and the author acknowledges that the Site and Study Area reflect the boundaries of the LCAs of the *North Kesteven Landscape Character Assessment* relatively accurately; a brief overall summary is provided in the LVIA of the existing landscape baseline at paragraphs 10.5.2 and 10.5.3, with a detailed narratives contained within section 1.5 of Appendix 10.2. The brief summary in the main LVIA chapter, while limited in detail, aids readers basic understanding of the baseline landscape character.

4.5 No further detailed, or finer grained landscape character assessments have been carried out in the LVIA, which we have assumed is due to the author acknowledging that through the field work carried out, the published landscape character assessments accurately reflect the site and study area.

4.6 This process, undertaken by the applicant, resulted in two district landscape character areas (**LCA**) being considered as landscape receptors for the assessment of effects on them by the Development. These are *LCA 7: Limestone Heath*; and *LCA 11: Central Clays and Gravels*, which are two LCA defined and described in *the North Kesteven Landscape Character Assessment*. The Site falls directly within these two LCA, which the LVIA identifies as *"host landscape character areas".* We agree that beyond the two LCA of LCA 7: Limestone Heath; and LCA 11: Central Clays and Gravels, there are unlikely to be any Significant landscape effects on any of the other identified LCAs.

4.7 Further detail of the landscape baseline is provided within *Appendix 10.2: Baseline Landscape Character Appraisal*, and *Appendix 10.3 Landscape Sensitivity Appraisal*.

Landscape Assessment

4.8 The Landscape Assessment is detailed within section 10.7 of the LVIA, which refers to *Appendix 10.3: Landscape Sensitivity Appraisal*, which includes a clear assessment of Value and Susceptibility, and subsequently the Sensitivity of the landscape receptors, which is aligned with the criteria provided within the methodology. The landscape assessment commences at paragraph 10.9.2 and 10.9.3, which summarises the sensitivity of the two identified landscape receptors within *Table 10.9*.

4.9 As agreed at the pre-application stage, the National Character Areas have not been assessed and are referred to for context only.

4.10 In line with the methodology, the assessment of the landscape effects considers the change to the identified landscape receptors. Both of the identified landscape receptors have been assessed as being of medium/low sensitivity,

4.11 The LVIA identifies significant landscape effects at the phases of **construction, operation (year 1),** and **operation (year 10),** however no Significant landscape effects were identified at the **decommissioning** stage. The following effects upon identified landscape receptors are identified in the LVIA:

- At **Construction** the following receptors were assessed as having the following landscape effects:
    - LCA7: Limestone Heath: **Major/Moderate Adverse: Significant** (temporary);
    - LCA 11: Central Clays and Gravels: **Major/Moderate Adverse: Significant** (temporary);
- At **Operation (Year 1)** the following receptors were assessed as having the following landscape effects:
    - LCA7: Limestone Heath: **Major/Moderate Adverse: Significant**;
    - LCA 11: Central Clays and Gravels: **Major/Moderate Adverse: Significant**;
- At **Operation (Year 10)** the following receptors were assessed as having the following landscape effects:
    - LCA7: Limestone Heath: **Major/Moderate Adverse: Significant**;
    - LCA 11: Central Clays and Gravels: **Moderate Adverse: Not Significant.**

4.12 These 'Significant' effects represent direct effects on the landscape of the entirety of the Site. At year 10, LCA7: Limestone Heath, which accounts for the majority of the land within the DCO boundary, has been assessed as having a **Major/Moderate Adverse residual** effect even when mitigation planting has established. LCA 11: Central Clays and Gravels has been judged by the author as having a **Moderate Adverse residual** effect even when mitigation planting has established, however has judged this to not be Significant. This accounts for a direct effect on this landscape receptor, and while we agree that professional judgement has been applied and a rational provided within paragraph 10.9.193 in regards to not being

judged a Significant effect, we would query this judgement and would welcome the opportunity to clarify this further during the examination stage.

4.13 Localised removal of vegetation is identified in the assessment of landscape effects; however, it is unclear whether this includes vegetation works on the wider highways network, and what this would entail. We strongly recommend limiting vegetation loss along Site boundaries for access or sight lines, or along construction access routes, because this has the potential to change the character of the local landscape beyond the limits of the Development.

5.0 Appraisal of Visual Baseline and Effects

The following section provides a review of the Visual Baseline and Effects, based on the following criteria:

- *Has the methodology been followed in the visual assessment?*
- *Are all visual receptors and all likely effects comprehensively identified and assessed?*
- *Has the value and susceptibility of visual resources been appropriately addressed?*
- *Is there a clear and concise summation of the visual effects of the proposals?*
- *Are the viewpoints that have been used appropriate and meet the number, location and requirements agreed in discussions at the pre-application stage during scoping and consultation?*
- *Are the Visualisations/Photomontages that have been used appropriate and meet the number, location and requirements agreed in discussions at the pre-application stage during scoping and consultation?*

Visual Baseline

5.1 The Visual Baseline is considered in section 10.5 of the LVIA, and describes in paragraph 10.5.16 that the primary visual receptors identified in the Study Area likely to be affected by the development are Residents; Users of PROW; and Users of local road network. The process of identifying visual receptors started with the development of a Zone of Theoretical Visibility (**ZTV**) analysis, used to assist and identify potentially sensitive receptors. This is described in paragraph 10.5.20 to 10.5.11, with Visual Receptors identified on Figure 10.3 and the ZTVs shown on Figure 10.5.

5.2 Following fieldwork, utilising the information presented within the ZTVs, visual receptors likely to experience views of the construction, operation or decommissioning of the Development were identified. Viewpoints were subsequently selected to represent views from these receptors. The selection of viewpoints formed part of the pre-application consultation and includes locations recommended as part of this process. Viewpoints are located on Figure 10.4.

5.3 Paragraph 10.5.11 summarises the identified receptor groups (residential locations, PROW, and from roads) with likely views of the scheme.

5.4 Paragraph 10.9.10 notes that *"In order to inform the assessment of magnitude and significance of residual effects on landscape character and visual amenity, viewpoint analysis has been undertaken for a total of 40 assessment viewpoints".* These forty viewpoints are presented as photographs within *ES Volume 4: Landscape Visualisations*.

5.5 The baseline follows the LVIA methodology and considers the consultation undertaken at the pre-application stage, which led to agreement on the 40 viewpoint locations. Further detail of the visual baseline is provided within *Appendix 10.4: Viewpoint Analysis.*

Visualisations/Photomontages

5.6 Viewpoints representative of the visual receptors were identified through consultation and agreed upon (refer **Appendix A**). This baseline process resulted in the identification of twelve viewpoints to be developed as visualisations to represent the views of the visual receptors.

5.7 Photographs of viewpoints have been prepared as Type 1 (annotated photographs) and presented within *ES Volume 4: Landscape Visualisations*. Of these viewpoints, twelve have been developed as Type 3 (photomontages) visualisations and presented in *ES Volume 4: Landscape Visualisations* for year 1 and year 10. A methodology for photography and visualisations is provided in *Appendix 10.1: Landscape and Visual Methodology and Assessment Criteria*.

Visual Assessment

5.8 The Visual Assessment is detailed within section 10.7 of the LVIA which includes an assessment of value and susceptibility, and subsequently the sensitivity of visual receptors and viewpoints, which is aligned with the criteria provided within the methodology. A viewpoint analysis has been carried out on the fourty assessment viewpoints to inform the assessment of magnitude and significance of residual effects on visual amenity. This is detailed within Appendix *10.4: Viewpoint Analysis.* This is subsequently summarised in *Table 10.11 Viewpoint Analysis Summary* within the LVIA, which clearly lays out the Scale of Change for both visual and landscape aspects.

5.9 The visual assessment commences at paragraph 10.9.4 and Table 10.10 summarises the sensitivity of the identified visual receptors through combining value and susceptibility. Twelve receptors have been assessed as being of High/Medium sensitivity, with none identified as being of a high sensitivity.

5.10 The visual baseline is structured around receptors with viewpoints utilised to represent views and inform judgements on magnitude and significance of residual visual effects of those identified receptors. This approach is aligned with recent LI guidance which confirms that the "*focus of the visual assessment should be the visual receptors"*, and that viewpoints are for the *"illustration of the visual effects*".

5.11 The LVIA identifies significant visual effects at the **construction, operation (year 1),** and **operation (year 10)** phases, however no significant visual effects were identified at the **decommissioning** stage.

5.12 The following significant effects are identified in the LVIA, summarised in paragraphs 10.9.55 to 10.9.136 (for construction effects) and 10.9.194 to 10.9.333 (for operation effects – both year 1 and residual at year 10) within the LVIA:

- At **Construction**:
    - **Major Adverse** (significant) visual effects for:
        - PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary (including several 'Stepping Out' walks);
    - **Major/Moderate Adverse** (significant) visual effects for:
        - Minor Roads to Temple Bruer and Thompsons Bottom Farm
        - PRoWs and lanes north-west between A15 and Wellingore Heath including New England Lane and Gorse Hill Lane
    - **Moderate Adverse** (significant) visual effects for:
        - PRoW between RAF Digby and B1188 (Footpath R5/1);
        - Bloxholm Woods Local Nature Reserve Footpath;
        - Spires and Steeples Trail;
        - A15 trunk road;
        - B1191 (Heath Road)
    - **Moderate Adverse** (Not significant) visual effects for:
        - Navenby Lane
        - Church Lane, church and properties at Brauncewell
        - PRoWs and lanes south-west between A15 and Brauncewel

These are typically identified for receptors that are in close proximity to the development with limited or absent screening. These **Moderate** and **Major Adverse** effects are considered to be significant and would result from the proposed construction activity seen at close range across a wide extent of a view.

- At **Operation (Year 1)**:

  - **Major Adverse** (significant) visual effects for:
    - PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary (including several 'Stepping Out' walks);

  - **Major/Moderate Adverse** (significant) visual effects for:
    - PRoW between RAF Digby and B1188 (Footpath R5/1);
    - Minor Roads to Temple Bruer and Thompsons Bottom Farm;
    - PRoWs and lanes north-west between A15 and Wellingore Heath including New England Lane and Gorse Hill Lane;
    - A15 trunk road;

  - **Moderate Adverse** (significant) visual effects for:
    - Bloxholm Woods Local Nature Reserve Footpath;
    - Spires and Steeples Trail;

  - **Moderate Adverse** (Not significant) visual effects for:
    - Navenby Lane;
    - Church Lane, church and properties at Brauncewell;
    - PRoWs and lanes south-west between A15 and Brauncewel;
    - B1191 (Heath Road)

    These are typically identified for receptors that are in close proximity to the development with limited or absent screening. These **Moderate, Major/Moderate Adverse** and **Major Adverse** effects are considered to be significant and where any mitigation planting is yet to establish and is subsequently providing limited screening or integration of the development.

- At **Operation (Year 10)**:

  - **Moderate Adverse** (significant) visual effects for:
    - PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary (including several 'Stepping Out' walks);
    - A15 trunk road;

    Moderate Adverse (Not significant) visual effects for:
    - PRoWs and lanes south-west between A15 and Brauncewel
    - PRoWs and lanes north-west between A15 and Wellingore Heath including New England Lane and Gorse Hill Lane

5.13 The development has been identified in the LVIA as resulting in a Significant change to a variety of visual receptors during construction and in the early years of operation and maintenance, with Significant *residual* visual effects much reduced in number. Seven of these sensitive receptors were assessed as having significant effects prior to any mitigation planting maturing (at Operation year 1). This reduces to two receptors experiencing significant residual effects at year 10 which suggests a potential over reliance upon mitigation planting to screen the proposals without full attention to the potential impact of this screening on the landscape. These residual Significant effects have been identified as arising from sensitive users along PROW and users of the A15 where it is not possible to sufficiently screen views of the development, or in the case of the A15 where the mitigation itself may cause an adverse effect (through screening open views). The reduction in Significant visual effects relies upon the successful establishment of the mitigation planting scheme.

5.14 Access, and the wider highways elements of the scheme, do not appear to be fully considered in the LVIA beyond increased traffic during construction and decommissioning phases. This is despite the potential for adverse effects on the views of the rural landscape including potential vegetation loss, urbanisation and reduction of visual amenity. Consequently, the visual effects during construction may be underestimated within the LVIA due to the unconsidered impact of loss of vegetation. We recommend limiting vegetation loss along site boundaries, for access or sight lines, or along construction access routes, as this has the potential to change the character of the local landscape beyond the limits of the development. Clarification on this matter by the applicant should be provided.

6.0 Appraisal of Cumulative Landscape and Visual Effects and Residential Visual Amenity Assessment

The following section provides a review of the cumulative effects and Residential Visual Amenity Assessment (RVAA), based on the following criteria:

- *Have cumulative landscape and visual effects been addressed?*
- *Are the RVAA and cumulative effects methodologies in accordance with relevant guidance and meet the requirements of the relevant Regulations?*
- *Does the methodology and scope of the assessment of cumulative effects and RVAA meet the requirements agreed in discussions at the pre-application stage during scoping and consultation?*
- *Has the methodology been followed consistently?*
- *Are residential and cumulative receptors and all likely effects comprehensively identified?*
- *Are any residential properties (receptors) likely to experience significant effects to their visual amenity?*

Cumulative Methodology

6.1 Cumulative landscape effects are considered in *Chapter 16: Cumulative Effects*, and not summarised in the LVIA chapter. It would have been useful to provide a brief summary in the LVIA chapter, however the cumulative landscape and visual effects section within ES Chapter 16 is dealt with separately in paragraphs 16.6.11 to 16.6.45 and provides a clear assessment of the cumulative landscape and visual effects.

6.2 Schemes that are considered for the cumulative assessment are identified within *Table 16.3 Short list of other existing development and/or approved development* and illustrated on *Figure 16.2: Cumulative Short List Radius*. *Table 16.2 Zone of Influence for each environmental factor* clarifies that a 10km zone of influence from the order limits has been considered for cumulative Landscape and Visual matters.

Cumulative Landscape and Visual Effects

6.3 Cumulative landscape and visual effects are those that: "*result from additional changes to the landscape or visual amenity caused by the proposed development in conjunction with other developments"*.

6.4 National Grid Navenby Substation is identified as the primary project to potentially generate cumulative landscape or visual effects with Springwell Solar Farm. Subsequently Significant cumulative effects are identified through extending the overall area of development, increasing the land use area changed from agricultural to energy infrastructure, and also visually through increasing the extent the two schemes may likely be visible by receptors.

6.5 We note that para. 16.6.41 states that "*No further additional mitigation has been proposed to mitigate inter-project cumulative effects between the two developments.*" However, there are potential opportunities for the applicants of each scheme to coordinate mitigation planting in the area around the National Grid Substation, which we would recommend are investigated further if possible. For example, this may include the extending of carriageway hedgerow planting further north along the western edge of the A15 (such as along field parcels Bcd024, Bcd027, Bcd031), which are in the Springwell Order Limits and would bring mitigation planting closer to potential visual receptors, likely further screening the proposed National Grid Substation.

6.6 We would also expect that landscape and visual cumulative effects would be likely from:

- 23/0390/EIA SCO Town and Country Planning Act 1990 Navenby Heath 400 Megawatt (MW) Battery Storage Development 2km north west; and
- 24/0959/FUL Town and Country Planning Act 1990 RAF Digby Proposed office and training building Adjacent to Order Limits/within Order Limits.

Table 16.11 identifies cumulative effects from these two schemes, with further detail provided from paragraph 16.7.48. However the LVIA identifies in paragraph 16.7.55 that *"No significant inter-project cumulative effects have been identified and therefore it is considered that there is no additional mitigation is required above what is described".*

6.7 Leoda Solar Farm, to the west of Springwell Solar should also be considered in wider landscape and visual effects. While it is unlikely this scheme would be seen in the same view as Springwell, the change in land use in the wider landscape, along with potential for sequential views, particularly when considering travelling east to west with sequential views of Springwell, Leoda and Fosse Green possible along linear routes.

6.8 We also have concerns regarding effects on the national, county and regional landscape character areas; The mass and scale of several NSIP scale energy projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing these schemes across potentially several kilometres, albeit with gaps between the schemes. However repeated views and presence of large scale solar would undoubtably increase the susceptibility of receptors to changes in view.

6.9 To calibrate this cumulative change to the landscape, these schemes combined, if built, would clearly require the update of any published landscape character assessment, including at a national level (NCA's), so as to include large scale solar as a defining land use characteristic, as well as agriculture. This is a clear and marked change to landscape character.

Residential Visual Amenity and Settlements

6.10 Residential Visual Amenity has been assessed and presented within *Appendix 10.5 Residential Visual Amenity Assessment*. As clarified within paragraph 10.4.53 of the LVIA *"Residential Visual Amenity Assessment is a stage beyond Landscape and Visual Impact Assessment and focuses exclusively on private views and private visual amenity",* whereas the LVIA process is typically associated with public views from public areas.

6.11 The methodology for assessing Residential Visual Amenity is outlined within Section 1.4 of Appendix 10.5. This correctly references the Landscape Institute's Technical Guidance Note *2/19: 'Residential Visual Amenity Assessment',* which identifies in paragraph 1.3.2 of

Appendix 10.5 that the Residential Visual Amenity Threshold (**RVAT**) is reached when further the change to visual amenity of individual properties identified as *"having the greatest magnitude of change"*

6.12 *Table A10.5.1 Preliminary residential property visits* within *Appendix 10.5* and *Figure 10.10* identify those properties identified and those visited sited as part of the assessment of Residential Visual Amenity.

6.13 Paragraph 10.7.1 of Appendix 10.5 concludes that while there will be significant adverse visual effects from several properties, none of these will reach the RVAT.

6.14 Paragraph 10.7.2 goes on to identify mitigation commitments that have been developed to reduce visual effects on residential properties.

6.15 A concern was identified at the scoping stage that receptors in the villages/settlements of Scopwick, Kirkby Green, Blankney and Ashby de la Launde; along with residents of the barracks at RAF Digby, would have views of the development, and subsequently had the potential to experience adverse visual effects. It was requested that the applicant include an assessment of changes in view from these receptors.

6.16 Now the scheme is fixed and has responded to potential views from these receptors, there is limited intervisibility between the settlements and the proposals as identified in the LVIA, which is detailed in paragraphs 10.5.18 to 10.5.27 and Paras 10.5.28 to 10.5.30 of the LVIA. We have not identified anything that would contradict the statements in regards to intervisibility made in the LVIA. Therefore, any further detailed assessment by the applicant would re-iterate the statements made in paragraphs 10.5.18 to 10.5.27 and Paras 10.5.28 to 10.5.30 of the LVIA, and therefore would not be required.

6.17 The key areas of concern are communities and visitors accessing these settlements on the surrounding road and footpath networks, where there are views of the development identified, and the LVIA confirms that sensitive visual receptors will experience adverse visual effects in these locations.

7.0 Mitigation and Design

The following section provides a review of the Mitigation and Design, based on the following criteria:

- *Is there evidence of an iterative assessment-design process and it is clear that this has informed the site redline, layout and primary and secondary mitigation?*
- *How appropriate is the proposed mitigation?*
- *Are potential cross-over topics, such as heritage or ecology, addressed and incorporated within the mitigation?*
- *Is the long-term management of existing and proposed vegetation properly addressed in any management plans to promote establishment?*

Evidence of Iterative Process

7.1 The scheme has been presented as evolving through an iterative process, with the landscape and visual findings feeding back into the design. This has been evident at several consultation workshops and meetings held between the applicant and LCC, NKDC and community engagement sessions. This is clarified in paragraph 3.1.3 which states that the scheme has: "*evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback".* It is noted that the layout appears to respond to issues and points raised through these sessions and the AAH TMs that were subsequently issued.

7.2 The design appears to have a clear evolution through different stages of the masterplan. The mitigation has responded to the recommendations of the local landscape character area reports and feedback from community events and statutory consultees.

Mitigation Measures

7.3 Section 3.2 of the ES describes Green Infrastructure proposed as part of the Scheme (covered by Work Order 9). The location of the proposed Green Infrastructure is subsequently located according to the Works Plans.

7.4 Section 10.6 of the LVIA describes the embedded mitigation measures of the scheme which avoid, where practicable, adverse effects on the landscape and views. This process is described in more detail within ES Chapter 3 and Chapter 4. These mitigation proposals reference a series of documents within the DCO package, in particular the Design Approach document which lays out how landscape and visual matters have been addressed within the design.

7.5 The *Outline Landscape and Ecology Management Plan* provides information regarding the establishment and maintenance of the planting associated with the Development, as shown on *Figure 3.1: Zonal Masterplan* and *Masterplan* and in more detail within *Figures 3.3A* to *3.3F: Green Infrastructure Parameters*.

7.6 The success of the landscape mitigation to meet the objectives laid out in the management plan - to integrate and screen proposals, promote conservation and protection of the environment, and encourage ecological and habitat diversity - is highly dependent upon the successful management and maintenance of the new planting, as well as the protection of exiting trees and hedgerows. The maintenance operations provide an initial overview of operations; however, we would expect the management plan to be developed further, well beyond the initial 5-year period, particularly if landscape and visual effects are being assessed at 10 years. The long-term reduction in landscape and visual effects, presented in the LVIA, are based on the long-term success of the landscape mitigation, and therefore the management plan should cover at least this period, and likely should be in place and actively managed for the lifetime of the project. Similarly, any early planting (pre-construction) should be included in the maintenance plan as the reduction in effects described in the LVIA are also based on the assumption that this too will have established as planned.

7.7 Monitoring of the proposals is a key aspect of the mitigation plan and is something which needs further development to ensure there is sufficient robustness to deal with the challenging climatic conditions when it comes to establishing new planting. The updating of the management plan every 5 years after the initial establishment period will go some way to ensuring that it is kept valid and can respond to issues and trends effectively. Plant replacements should also be considered, and also for a longer period then a “standard” 5 years, and cover for scenarios where there are large areas that have not established, or areas of die back beyond 5 years.

7.8 There is a potential over reliance within the LVIA upon planting to mitigate the visual effect of the development; the character of the area is relatively open, and too much planting to screen the development without due care for the location, could have detrimental impacts. The PROW and local roads in the study area enjoy an open aspect across some areas of the study area, in particular along the A15, where users currently experience open views across this agricultural landscape. Therefore, care needs to be taken to prevent the loss of this character through an overbearing set of mitigation proposals.

7.9 We would re-emphasise the point made in the cumulative effects section regarding potential opportunities for the applicants of Springwell and the Navenby Substation schemes to coordinate mitigation planting in the area around the proposed National Grid Substation.

8.0 Conclusions and Recommendations

The following section provides an overall summary and conclusion on the suitability of the Landscape and Visual elements of the DCO Application and whether they are sufficient to support an informed decision. This includes the adequacy of the LVIA, reviewed in accordance with the Landscape Institute *Technical Guidance Note 1/20 (10 Jan 2020): Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)*.

Finally, there are recommendations for further information that should be provided to assist in the examination of the DCO Application.

Summary and Conclusions on the LVIA

8.1 The LVIA and the associated figures, appendices and documents provide a thorough analysis of the Development and is appropriate to the scale and context of the Site. The process of assessment is thorough and well explained in the volumes, which include a clear summary of findings and identification of significant effects on the landscape and visual baseline.

8.2 By reason of its mass and scale, the Development would lead to significant adverse effects on landscape character and visual amenity at all main phases of the scheme (construction, operation year 1, operation year 10). The Development has the potential to transform the local landscape by altering its character on a large scale. This landscape change also has the potential to affect a wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area.

8.3 The scale and extent of development would also lead to significant adverse effects on views from receptors, by altering from views within an agricultural or rural landscape to that of a landscape with large scale solar development.

8.4 The cumulative landscape and visual effects of the Development have the potential to bring about significant landscape and visual effects, however adjacent schemes identified within the ES are relatively small in comparison with the wider Springwell order limits schemes. We have concerns regarding effects on the national, county and regional landscape

character areas. The mass and scale of these projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing these schemes across potentially several kilometres, albeit with gaps between the schemes. This is a clear and marked change to landscape character.

8.5 Tree and vegetation removal associated with the Development, including wider highways improvements and access for construction, must be clarified through the examination process, and subsequently any works (such as lopping or pruning), or removal of trees and hedgerows must be agreed prior to any works commencing. Prior to any construction activities, all tree and hedgerow protection methods associated with that phase of construction should also be clarified and subsequently agreed with the appropriate authority (in this case the local planning authority). This would be to BS:5837 Trees in Relation to Construction and any subsequent arboriculture method statements, again this should be approved by the appropriate authority. In particular this should ensure existing trees, and associated root protection areas, are suitably protected throughout the entire construction period. This would also likely include areas within the order limits, but away from construction activity, such as storage areas for materials which may suffer from tracking by plant that would damage tree root protection zones.

8.6 While the submission includes landscape proposals (as shown on the Green Infrastructure Parameters plans), these are of a high level and it would be expected that if the project proceeds much more detailed plans would to be submitted and subsequently agreed with the appropriate authority prior to the commencement of any works and secured through the DCO. This would include clear detail of the areas of landscape mitigation, location and types of planting (species), as well as number, density and specification. The mitigation illustrated on the *Outline Landscape and Ecology Management Plan* has been utilised to assess the landscape and visual effects of the scheme, therefore we would expect any detailed landscape proposals to consist of the area and extent shown on these plans as a minimum.

APPENDIX A

Previous AAH Consultation documents:

AAH TM01 Landscape and Visual Scoping Opinion 14th April 2023

AAH TM02 Initial Viewpoint Comments 29th June 2023

AAH TM03 Viewpoint Comments 15th August 2023

AAH TM04 PIER Comments 19th February 2024

AAH TM05 Viewpoint Comments 10th July 2024

Technical Memorandum 1: AAH TM01

Lincolnshire County Council, Springwell Solar Farm

Landscape and Visual Scoping Opinion

This Review has been carried out by AAH Consultants on behalf of Lincolnshire County Council (LCC) and relates to landscape and visual issues and elements only. It is based upon a review of the relevant sections of the following document:

- *Springwell Solar Farm; Scoping Report; 21st March 2023.* Prepared by *RSK Environment Limited* for *Springwell Energy Farm Ltd.*

Overall, we would expect that the assessment of potential Landscape and Visual matters and evolving proposals relating to the Springwell Solar Farm, as a Nationally Significant Infrastructure Project (NSIP), follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings:

- Landscape and Visual Impact Assessment (LVIA) Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (AVRs):
    - Quantity and location;
    - Phase depiction;
    - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (RVAA) should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

We would also expect the production of the Landscape and Visual chapter of the Environmental Statement (ES), which would be in the form of a Landscape and Visual Impact Assessment (LVIA), and any supporting information (such as plans or figures) reflect current best practice and guidance from, as a minimum, the following sources:

- *'Guidelines for Landscape and Visual Impact Assessment'*, (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- *'An Approach to Landscape Character Assessment'*, Natural England (2014);
- '*Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals'*, 17th September 2019 by the Landscape Institute (LI);
- *'Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)'*, 10th January 2020 by the Landscape Institute (LI) ;
- *'Technical Guidance Note (TGN) 04/20 Infrastructure',* April 2020 by the Landscape Institute (LI); and

- *'Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations'*, May 2021 by the Landscape Institute (LI).

While the focus of this review is on Landscape and Visual matters, other information provided within the report, and associated Appendices, has also been considered, providing background and context to the site. At this initial stage of the NSIP process, the content and level of information provided by the developer within *Section 6.5 Landscape and visual* are generally considered satisfactory, however, as stated previously, we would expect to discuss this content and approach as part of the iterative process. Due to the scale and extent of the site and proposed development, we would be able to discuss and agree the *Scoping questions* within *Section 6.5.14* as part of this ongoing process, as at this stage it is not possible to provide full answers to these questions. The following should be considered in the evolving assessment and layout:

Viewpoints

The final locations of viewpoints are to be reviewed and agreed with LCC and other relevant stakeholders. The final viewpoint selection should also consider views of taller and more conspicuous elements, such as battery storage or sub-stations once the layout is more developed, as well as consider potential key, or sensitive, viewpoints. We would welcome an initial discussion and subsequent workshop (on site if appropriate) with the developer's team in regards to proposed viewpoints.

Photomontages

To gain an understanding of the visibility of the development and how the panels and infrastructure would appear in the surrounding landscape, Photomontages/Accurate Visual Representations (AVRs) should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with LCC and other relevant stakeholders and produced in accordance with *TGN 06/19 Visual Representation of Development Proposals*. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

Methodology

As stated previously, the LVIA should be carried out in accordance with the GLVIA3 and undertaken by suitably qualified personnel. The methodology provided at *Section 6.5.11 and Appendix D* is typical of those used for ES Chapters and standalone LVIA where potential significant effects can be considered and reflects the guidance in GLVIA3. We would request that the most up to date technical guidance be used and the methodology is further interrogated at the next phases of the project.

The *Landscape and Visual* methodology within *Appendix D* identifies that **Significant** effects are identified as those that are "*Major or Major/Moderate*", and that in the case of predicting *Moderate effects* professional judgement will be applied. This is fine and follows GLVIA3, however for full transparency, we would expect that a full explanation be provided in the assessment as to whether a Moderate effect on a receptor is assessed as being **Significant** or not, and not simply relying on stating that an effect is not significant "based on professional judgement".

The methodology should also clearly lay out the process of assessing temporary and permanent elements of the scheme, and the LVIA should clearly identify those elements that would not be

decommissioned at the end of the life of the development, such as the National Grid substation, and assessed accordingly.

Scope of the Study Area:

It is acknowledged in *Section 6.5.2* that, based on desktop (ZTV mapping) and field study, an initial Study Area covering 3km has been allowed for the proposed development, and an extended Study Area covering 5km for the National Grid substation and National Grid connecting tower. At this early stage, we recommend these extents are discussed and further reviewed as the full extent of potential visibility of the development is not yet fully known, and the ZTV mapping within *Appendix F* does identify potential visibility beyond these extents. The ZTV mapping would be updated once the proposals have developed (as stated within paragraph 13.5) and the study area should not be fixed until the full extents of visibility are known from both desktop and site work.

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

Landscape

Published landscape character areas have been identified, however to align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and likely need to include a finer grain landscape assessment that includes the Site and immediate area that also considers individual landscape elements or features that make up the character area. *Sections 6.5.8*. and *6.5.9*. identify a range of potential landscape receptors to be scoped in or out of the LVIA, however at this early stage of the project we request these be reviewed and consulted upon further once proposals have been developed and we are not in a position to confirm their inclusion or omission.

Visual

Several visual receptors are identified within *Sections 6.5.5*. and *6.5.8*. We would expect that the visual assessment would include for identification of visual receptors, and not just an assessment of any agreed viewpoints, which should clearly cross reference viewpoints to associated receptors. *Sections 6.5.8*. and *6.5.9*. identify a range of potential visual receptors to be scoped in or out of the LVIA, however at this early stage of the project we request these be reviewed and consulted upon further once proposals have been developed and we are not in a position to confirm their inclusion or omission.

The visual assessment should take account of the 'worst case scenario' in terms of winter views, and effects associated with landscape mitigation at the Operational Phase (year 1), Residual Phase with planting having established (10 to 15 years), and at the Decommissioning Phase.

The LVIA should ensure all elements associated with the development are considered and assessed, such as battery storage, sub-stations, CCTV poles and boundary fencing, which may be more visible than panels due to height, mass and extent.

Cumulative impacts

Cumulative Landscape and Visual effects should be assessed in regards to other major developments, and in particular commercial scale solar developments, as appropriate in regards to proximity and scale.

Mitigation and Layout

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate.

We would also expect the landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Any Landscape Scheme and associated Outline Landscape and Ecological Management Plan should accompany the ES which should cover the establishment period, which is assumed would be up to 15 years to cover the period up to the residual assessment. The management plan should provide for both new planting and existing retained vegetation and how it will be managed and protected through all phases of the development.

[redacted]

AAH Landscape

[redacted]

14th April 2023

AAH consultants

Technical Memorandum 2: AAH TM02

Lincolnshire County Council, Springwell Solar Project

Visual Amenity: Initial Viewpoint Comments

An initial Site visit was carried out by representatives from AAH, Lincolnshire County Council (LCC) and North Kesteven District Council (NKDC) on 1st June 2023, which was followed by a meeting with Stephenson Halliday and LDA Design at LCC offices to discuss the proposed scheme, progress to date and strategy for the landscape elements over the coming weeks and months. Following the initial site visit and discussions on the 1st June, a plan and schedule identifying a shortlist of potential viewpoints for the LVIA were issued to AAH, LCC and NKDC via email. AAH subsequently visited site with Stephenson Halliday on the 13th June 2023 to view the site and surrounding area and visit key locations and discuss the potential viewpoints currently proposed for the LVIA.

Therefore, we have the following general comments and requests:

1. Comments provided are based on the information provided to AAH and subsequent AAH fieldwork carried out to date. Therefore any comments are based on the layouts currently provided, which are confirmed as undergoing development. This is to be expected as part of an iterative process. While we understand that the information provided to date is not intended to undergo wholesale changes, the layout is undergoing design development and subject to the final layouts presented, additional viewpoints or information may be requested. This is particularly pertinent for taller/larger and permanent elements such as sub stations or battery storage which due to their mass will likely be more conspicuous in the landscape;

2. The locations of ancillary elements, such as fencing, Battery Storage, Inverters, Transformers and Switchgears will be important in reducing visual impacts as these could appear more conspicuous than uniform PV arrays – their location should be carefully considered in relation to visual receptors, but also relating to the PV Arrays. The final size and location of all these ancillary elements should be provided and indicated on the layouts when available to enable their impact to be understood; and

3. We do not feel we can provide more detailed feedback or suggested viewpoint locations at this stage on the sub-station location(s) until further information is provided. However, we would expect the LVIA to provide a clear evaluation and likely effects of these.

For detailed comments on the proposed viewpoints, please refer to the appended schedule provided to us by Stephenson Halliday. The detailed comments have been added to an additional column to aid clarity.

The following additional comments are in regards to visibility of the site from general groups of receptors and viewpoints, and we have also marked up the plan provided to us by Stephenson Halliday, appended to this memo, which locates the comments below. We would suggest the comments provided are discussed further prior to finalising. If it is considered that suggested views of the site and development are not attainable from any identified areas, or viewpoints not appropriate, a statement to this effect should be provided to aid transparency. It is important that all viewpoint photography should provide the most advantageous views of the site and proposed development, and avoid any obstructions to a clear view such as cars:

A. **Longer distance views identified (X2, X1, X3) are unlikely to provide views of the Development, and at this stage views from receptors in these areas to the west, such as communities at Waddington, Navenby, Wellingore or Welbourn or along the A607, or PROW in these areas. However, a view from more sensitive receptors in these areas would be useful to demonstrate this, such as along the eastern settlement edge.**

B. **Potential additional viewpoint included from the area around Thompson's Bottom and western boundary.** This would provide a clear view east to the site adjacent to the OH line and will include views of the A15 and also longer range views to the east;

C. **Please review visibility and potential views of the site and development from the area south west of VP C12, around Church of St John the Baptist.** While intermittent vegetation and landform will screen some views, there are potentially sensitive receptors in this area and the upper extents of development may be visible. This may not require a viewpoint, however views from this location should be considered within the assessment.

D. **Please review visibility and potential views of the site and development from within Bloxham Wood Nature Reserve.** Subject to the location of the substation, it is unlikely that this would require an additional viewpoint, as we have assumed Viewpoints I20 and I18 would provide an illustrative view of this), however views from this location should be considered within the assessment as it is unclear as to the extent as to which vegetation would screen views of the development from this location as a path runs close to the southern edge of the woods;

E. **Please review visibility and potential views of the site and development from PROW Temp/1/1 and Temp/2/1 at junction of the A15.** Views from this location (and along the PROW to the east and west) would likely be more sensitive and close range than from Viewpoint C17. Would a viewpoint from this location be appropriate, either relocated C17 or an additional view)?

F. **Views from PROW within Eastern Parcel (e.g. H8, H18, D8 etc.):** these are from sensitive receptors and viewpoints from these PROW will be required to illustrate these views. Locations for photographs should be selected to ensure the most advantageous views of the site and proposed development are illustrated with proposals centre to the view, avoiding obstructions where possible;

G. While views along the B1191 between Scopwick and RAF Digby are covered by Viewpoints H12 and H14, would a view **covering Scopwick Mill and PROW Scop/13/1** be required to cover more sensitive receptors in this area? Alternatively, these views may be covered by the assessment when discussing potential receptors, however it is important to identify these.

H. Viewpoint B15 provides a clear view north to the Site from users of the A15. The heritage asset of Dunsby Village lies just to the south. Is there a way to capture this in the view without compromising the clear view to the Site, or would B15 be representative of this potential view?

As stated, at this stage we do not have details on the final location and appearance/extent of taller/larger elements that for part of the development which would likely have visual impacts that may require additional viewpoints beyond those initially identified.

[redacted]
AAH Landscape

[redacted]

29 June 2023

Legend:

- Proposed Site Boundary
- Photo Locations

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter

Rev	Date	Description	Drn	Chk	App
00	09/06/23	First Draft	MP	JI	

Springwell Solar Farm

Springwell Solar Farm

DOCUMENT:
Consultation

TITLE:
Shortlisted Viewpoint Selection for Discussion with NKDC/LCC

FIGURE NUMBER:

0 0.5 1
Kilometers

Scale: 1:50,000 @ A3

REV 00

Path: C:\Users\mo.pamplin.RSKHELSBY\RSK Group\SH Projects 200s - 0297 - Acre Lane Solar Farm\05 Working Files\02 GIS\P663620.aprx\Consultation Photo Locations

0297 - Springwell Photography Details

Photo Location reference	*Location Name*	*Coordinates*	Co-ordinates		*Time*	*Date*	*Potential Viewpoint?*	**AAH/LCC/NKDC initial Comments on Viewpoints (to be read in conjunction with AAH TM02)**
			X	*Y*				
A3	Spires and Steeples Trail junction with Trundle Lane - N of Scopwick	TF 06972 58430	506972	358430	11.47am	07.02.23	Yes - view from SAST at shouth east corner of Eastern parcel	Agree
A5	Scop/3/1 at junction with Main Street, Scopwick	TF 07616 58049	507616	358049	12.16pm	07.02.23	Maybe - no view of development. Demonstrates no view from Scopwick	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
A10	Spires and Steeples Trail SE of Scopwick - Loctaion 3	TF 07529 57509	507529	357509	01.12pm	07.02.23	Maybe - no view of development. Demonstrates no view from SAST south of Scopwick	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
A12	Scop 7/1 at junction with B1191	TF 08651 57963	508651	357963	02.31pm	07.02.23	Yes - view from PROW immeiately north of Kirkby Green	Agree
A13	Scop 7/2 at junction with Scop 7/1	TF 08583 58371	508583	358371	02.47pm	07.02.23	Maybe - PROW approaching site	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
A17	B1188 jct with Bloxholm Lane - east side of junction	TF 06649 58523	506649	358523	03.44pm	07.02.23	Yes - B1188 at site access	Agree
B3	B1189 Moor Lane, Blankney	TF 10040 60859	510040	360859	10.42am	09.02.23	Maybe - View from B1189 (negligible glimpse of site through vegetation)	Fine - would illustrate potential eastern views.
B5	B1191, west of Junction with B1189 and Station Road	TF 11142 58573	511142	358573	11.17am	09.02.23	Maybe - Illustrates no view from B1191	Is this required? B3 may represent eastern receptors. B5 not particularly sensitive, and asssume no view.
B7	Main Street, west of junction with B1188, Lincoln Road	TF 07720 54830	507720	354830	12.05pm	09.02.23	Maybe - Illustrates negligible view from Digby	Assume limited view?
B10	Church Lane, north of All Staints' Church, Brauncewell	TF 04546 52463	504546	352463	1.06pm	09.02.23	Yes - glimpse view from Brauncewell	Agree: Subject to final location, sub-station may be visible in this location also. If so, assume view would also represent PROW to east
B11	North of junction of A15 and Church Lane	TF 03622 52628	503622	352628	1.22pm	09.02.23	Yes - southern boundary of western parcel	Agree
B14	Junction of Footpath Brau/10/1 and Long Lane	TF 01514 51973	501514	351973	2.16pm	09.02.23	Yes - view from south east of western parcel	Agree
B15	Junction of A15 and local road east of Dale Farm	TF 03847 51623	503847	351623	2.31pm	09.02.23	Yes - view from southern approach on the A15	Agree, would this view include heritage receptor Dunsby Village? If viewpoint relocated to south would the view likely be screened?
B20	The Viking Way / High Dike south of Temple Road	SK 99250 52993	499250	352993	4.18pm	09.02.23	Yes - Distant view from High Dike	Fine. Potentially senstive receptor, however long range view.
C1	Green Man Lane	TF 04209 59058	504209	359058	9.33am	10.02.23	Yes - distant view from minor road to the north	Fine: would this also represent potential views from PROW to the south (Scop/12/2, Scop/1/2, and Scop/1/1) which would likely be more sensitive?
C4	Field entrance, Temple Road	TF 03023 53125	503023	353125	10.50am	10.02.23	Yes - View from Temple Road	Agree
C7	Temple Road east of Temple Bruer	TF 01437 53626	501437	353626	11.18am	10.02.23	Maybe - demonstrates negligible view of site approaching from the west	A useful view to demonstrate visibility from the west
C9	Heath Lane, east of House Farm	TF 00420 57509	500420	357509	11.56am	10.02.23	Yes - View towards potential substation location	Fine. Not particularly sensitive, however provides views of potential substation from north. Could it be clarified if panels would be visible - if not, may be a useful northern view to demonstrate lack of visibility.
C10	Junction of Gorse Hill Lane and A15	TF 02355 56574	502355	356574	12.20pm	10.02.23	View from A15 on northern boundary of site	Agree
C12	New England Lane	TF 01271 55547	501271	355547	12.47pm	10.02.23	Yes - view from PROW near substation/BESS	Agree
C17	Junction of A15 and Green Man Lane	TF 01926 58598	501926	358598	2.02pm	10.02.23	Yes - View from A15 approaching site from the north	Is this the best location? Would an additional view, or potentially moving this viewpoint further south to intersection with PROW Temp/1/1 and Temp/2/1 be appropriate?
D8	Jct of Scop/738/1 and Scop/8/1	TF 09001 59249	509001	359249	11.52am	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
D10	Jct of BLN/4/3, BLN/4/2 and BLN/738/1	TF 08662 60144	508662	360144	12.23pm	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
D12	Permissive Path Between Scop /1134/1 and BLN/4/2	TF 08016 59686	508016	359686	1.00pm	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
D17	Jct of Bridleway Scop/1135/4 and Acre Lane (Restricted Byway)	TF 08239 58901	508239	358901	2.11pm	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
D19	Junction of Acre Lane and Scop/3/1	TF 08241 58453	508241	358453	2.28pm	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
E2	Blankney Stepping Out Car Park Picnic Area	TF 07418 60577	507418	360577	13.16pm	23.02.23	Yes - view from Stepping out picnic area on edge of Blankney	Agree: sensitive receptors and hih (relative) number of users.
F3	Heath Road at Slate House Farm	TF 04123 54238	504123	354238	12.26pm	24.02.23	Yes - illlustartes experience travelling along Heath Road	Fine - important views along this road between settlements, however, will proposals be visible from this location with plots to the east of Heath Road shown as not being developed? Assume this would also represent views from PROW Ashl/3/1 at Heath Road? Selection would be dependant upon final layouts and visibility of development
G1	A15 at junction with Warren Lane	TF 02761 55278	502761	355278	2.42pm	02.03.23	Yes - View from A15 mid way along the western parcel	Agree - openclose range view. Suggest multiple sheets to cover wide extents of view.
H5	Spires and Steeples Trail	TF 06855 59445	506855	359445	10.29am	08.03.23	Yes - View from SAST	Agree. Views from these sensitive receptors are important
H8	SCOP/1135/3	TF 07537 58946	507537	358946	11.23am	08.03.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
H9	Main Street, Ashby de la Launde	TF 05269 55085	505269	355085	12.07pm	08.03.23	Yes - illustrates view from Ashby de la Launde	Agree - if located at filed gate/access would offer an alternative more open view south than H10
H10	Junction of Heath Road (B1191) and Navenby Lane	TF 04815 55349	504815	355349	12.17pm	08.03.23	Yes - illlustartes experience travelling along Heath Road	Agree - important views along this road between settlements.
H12	Heath Road (B1191) near Digby Quarry	TF 05316 57209	505316	357209	12.56pm	08.03.23	Yes - illlustartes experience travelling along Heath Road	Agree - important views along this road between settlements. Would this adequately consider PROW Scop/13/1 and Scopwick Mill?
H14	B1191 Western Edge of Scopwick	TF 06358 57964	506358	357964	1.25pm	08.03.23	Maybe - demonstrates negligible view from western edge of Scopwick	Good location to demonstrate limited/no visibilit along B1191 and western edge of Scopwick. Will depend upon final layouts.Would this adequately consider PROW Scop/13/1 and Scopwick Mill?
H16	B1188 South of Long Wood Lane	TF 06745 59653	506745	359653	2.42pm	08.03.23	Maybe - demonstrates no view from B1188 leaving Blankney	Good location to demonstrate limited/no visibilit along B1188 and southern edge of Blankley. Will depend upon final layouts.
H18	BLAN/4/2	TF 07771 60245	507771	360245	3.08pm	08.03.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
H19	Blankney Walks Lane near Brickyard Cottage	TF 08370 60628	508370	360628	3.26pm	08.03.23	Yes - view from Blankney Walks Lane	Agree - VP from this location required
I1	Footpath Rows/5/1 west of Sheffield House	TF 06401 56655	506401	356655	09.00am	23.03.23	Yes - view from footpath through central parcel	Agree - views from PROW 5/1 required. How will the view from each three propose differ - are three required?
I5	Footpath Rows/5/1 north-east of The Maltings	TF 06086 56557	506086	356557	09.43am	23.03.23	Yes - view from footpath through central parcel	Agree - views from PROW 5/1 required. How will the view from each three propose differ - are three required?
I8	Footpath Rows/5/1 north of The Maltings	TF 05581 56426	505581	356426	09.59am	23.03.23	Yes - view from footpath through central parcel	Agree - views from PROW 5/1 required. How will the view from each three propose differ - are three required?
I10	Access track south of Rowston Cottages	TF 05142 56524	505142	356524	10.11am	23.03.23	Maybe - demonstrates limited view from RAF Digby looking east	While likely a limited view, would be useful to illustrate extent/lack of visibility from this aspect, as well as views from RAF Digby, and B1191 which together would have a relatively large number of receptors
I18	AshL/11/1 in Long Plantation (on field boundary)	TF 04464 53376	504464	353376	12.02pm	23.03.23	Yes - view from Stepping Out Walk through Bloxham Woods	Agree - final location may depend upon substation location.
I20	Bloxham Wood Nature Reserve Car Park	TF 03758 53324	503758	353324	12.32pm	23.03.23	Yes - view along Heath Road at entrance to Bloxham Woods	Agree - final location may depend upon substation location.
X1	A607 Boothby Graffoe	SK 98683 59338	498683	359338			Maybe - not yet visited and possibly no view but added to shortlist following meeting with NKDC/LCC on 01.06.23	Views of site and development appear unlikely. Suggest single view, maybe from edge of settlement to demonstrate extent/lack of visibility
X2	Viking Way north of Harmston	SK 97398 63178	497398	363178			Maybe - not yet visited and possibly no view but added to shortlist following meeting with NKDC/LCC on 01.06.23	
X3	A607 Leadenham	SK 96080 51557	496080	351557			Maybe - not yet visited and possibly no view but added to shortlist following meeting with NKDC/LCC on 01.06.23	

AAH consultants

Technical Memorandum 3: AAH TM03

Lincolnshire County Council and North Kesteven District Council, Springwell Solar Project

Visual Amenity: Viewpoint Comments

Following issuing AAH TM02 (Initial Viewpoint Comments), AAH and Stephenson Halliday/RSK held a meeting on the 3rd July to further discuss the project and potential viewpoints and seek agreement on the selection. Stephenson Halliday/RSK subsequently provided follow up email correspondence on 17th July 2023 which contained meeting minutes (from the 3rd July), proposed final list of viewpoints spreadsheet, plan of the location of the final proposed viewpoints, ZTVs of the solar PV development, and ZTVs of siting zones for infrastructure of various sizes including the National Grid and project substation. AAH on behalf of Lincolnshire County Council (LCC) and North Kesteven District Council (NKDC) have subsequently reviewed the information and provide comments as follows:

1. The meeting minutes provided by Stephenson Halliday/RSK from July 3rd provide an accurate reflection of the conversation held;

2. The viewpoints proposed by Stephenson Halliday/RSK in the email correspondence on 17th July 2023 provide a good spread of representative views that is proportional to the project and extent of potential visual receptors. At this stage no additional viewpoints would be required, however if the development layout and design parameters change from that currently presented, additional viewpoints may be required;

3. All viewpoint photography should be taken in accordance with *LI TGN 06/19: Visual Representation of Development Proposals*. To ensure transparency of the assessment process and reduce queries as to potentially downplaying effects, photography locations should be micro sited to safely provide the most advantageous unobstructed view of the site and proposed development which should be presented centrally to the view, be taken on clear bright days away from the sun to avoid dark images, and be clear of isolated obstructions within the view such as cars or wayward branches/vegetation etc.

4. Regarding any potential AVRs of the viewpoints that would be identified at the next stages, it would be beneficial to discuss and understand the rationale on selecting these: such as on a view by view basis or an approach as to where those that are expected to have significant or cumulative effects. We would also recommend the selection, level and type of visualisations are discussed and agreed through consultation;

5. The proposed 3km study area is appropriate from the solar PV development and 5km from the National Grid and Project Substation and National Grid connecting towers. However, the LVIA should clearly state the justification for these study areas, and thoroughly assess and confirm no significant views are available from beyond the study area. Also, as it is not confirmed as to whether the National Grid Substation and National Grid connecting towers are to be included within the redline boundary, and if so both the final location and design of these elements, and the Project Substation, is yet to be confirmed, therefore while every effort has been made to accommodate this with the viewpoint selection, additional viewpoints and extension of the 5km study area may be required subject to confirmation of these aspects.

6. In regards to landscape character areas in the North Kesteven Landscape Character Assessment, we agree that LCA 11 Central Clays and Gravels and LCA 7 Limestone Heath would form part of the baseline, and would likely be directly affected by the proposed development. LCA 6 Lincoln Cliff and LCA 13 Fenland sit to the fringes of the proposed study areas, and are unlikely to experience significant effects and subsequently are acceptable to be scoped out, however we would recommend these LCAs are identified in the LVIA, and if scoped out a brief statement is provided that recognises their proximity to the red line boundary and the rationale as to why they have been scoped out.

We are available to discuss these points, as well as the evolving scheme and pertinent information, such as LVIA methodology, as required and welcome a continuing dialogue and consultation with Stephenson Halliday/RSK on the project.

[redacted]
AAH Landscape on behalf of LCC and NKDC

[redacted]

15 August 2023

AAH consultants

Technical Memorandum 4 (AAH TM04)

Lincolnshire County Council and North Kesteven District Council, Springwell Solar: PEIR Landscape and Visual Comments

Introduction

AAH Consultants have reviewed the Springwell Solar Farm: *Preliminary Environmental Information Report* (**PEIR**), on behalf of Lincolnshire County Council (**LCC**) and North Kesteven District Council (**NKDC**), in relation to Landscape and Visual matters. Information downloaded from: www.springwellsolarfarm.co.uk and the documents that have been referenced, are as follows:

- **Preliminary Environmental Information Report Volume 1**
  - Chapter 1: Introduction
  - Chapter 2: Description of the Proposed Development
  - Chapter 3: Reasonable Alternatives Considered
  - Chapter 4: Approach to EIA
  - Chapter 6: Biodiversity
  - Chapter 9: Landscape and Visual
  - Chapter 12: Traffic and Transport
  - Chapter 14: Glint and Glare
  - Chapter 15: Cumulative Effects
- **Preliminary Environmental Information Report - Volume 2: Supporting Figures:**
  - Chapter 1
    - Figure 1.1 – Location Plan
  - Chapter 2
    - Figure 2.1 Environmental Features Plan
    - Figure 2.2 Site Boundary
    - Figure 2.3 Zonal Masterplan
    - Figure 2.4 Indicative Height Parameter Plan
    - Figure 2.5 Indicative Green Infrastructure Parameter Plan
    - Figure 2.6 Indicative Operational Access and Movement Parameters Plan
    - Figure 2.7 Indicative Cable Route
    - Figure 2.8 – Indicative Construction Compounds
    - Figure 2.9 – Indicative Construction Accesses Parameter Plan
  - Chapter 3
    - Figure 3.1 – Environmental Considerations
    - Figure 3.2 – Solar PV Design Development
  - Chapter 6
    - Figure 6.1 – Local Wildlife Sites
  - Chapter 8
    - Figure 8.1 – Non-designated heritage assets
    - Figure 8.2 – Designated heritage assets
    - Figure 8.3 – Sensitive Heritage Receptors
  - Chapter 9
    - Figure 9.1 – Landscape Study Area, Context and Designations
    - Figure 9.2 – Landscape Character
    - Figure 9.3 – Visual Receptors
    - Figure 9.4 – Viewpoint Location Plan

    - Figure 9.5 – Solar PV Standard ZTVs
    - Figure 9.6 – Solar PV Detailed Screening ZTV
    - Figure 9.7 – Siting Zone 6m ZTVs
    - Figure 9.8 – Siting Zone 12m ZTVs
    - Figure 9.9 – Residential Property Location Plan
  - Chapter 10
    - Figure 10.1 Agricultural Land Classification Survey
  - Chapter 11
    - Figure 11.1 Baseline Noise Locations
    - Figure 11.2 Receptor Locations
  - Chapter 12
    - Figure 12.1 Local Roads
    - Figure 12.2 Accident Severity
    - Figure 12.3 Sensitive Receptors
  - Chapter 15
    - Figure 15.1 – Cumulative Long-List Radius
- **Preliminary Environmental Information Report - Volume 3: Supporting Reports:**
  - Chapter 1
    - Appendix 1.1 – Glossary and Abbreviations
  - Chapter 4
    - Appendix 4.1 – EIA Scoping Report
    - Appendix 4.2 – Scoping Opinion from PINS
    - Appendix 4.3 – Scoping Opinion Response Matrix
  - Chapter 9
    - Appendix 9.1 LVIA Methodology and Assessment Criteria
    - Appendix 9.2 Extracts from Published Landscape Character Assessments
    - Appendix 9.3 Landscape Sensitivity Appraisal
    - Appendix 9.4 Preliminary Viewpoint Analysis
    - Appendix 9.5 Preliminary Residential Visual Amenity Assessment
  - Chapter 15
    - Appendix 15.1 – Longlist of other developments
- **Preliminary Environmental Information Report - Volume 4: Landscape Viewpoints:**
  - Viewpoints 1 to 14
  - Viewpoints 15 to 20
  - Viewpoints 21 to 38

The review takes into account previous AAH comments (Refer to Springwell Technical Memos *AAH TM01*, *AAH TM02* and *AAH TM03*), as well as meetings/workshops held with the Applicant team and any subsequent meeting minutes. The comments provided are intended to assist in guiding the next stage of the development process, refinement of the content of the LVIA chapter and the overall development proposals. It is not a final review of any of the preliminary findings or initial assessments.

PEIR Landscape and Visual Comments

A. Main Overarching Comments on the PEIR:

1. The proposed development is subject to EIA, and a Scoping Report was issued by the developer: *Springwell Solar Farm Scoping Report* 21st March 2023*,* prepared by RSK*,* which contained a section on Landscape and Visual*.* Subsequently, a Scoping Report Review was carried out by LCC (20th April 2023) and NKDC (19th April 2023) which were appended to the *Scoping Opinion* issued by PINS dated: 02nd May 2023. Overall, the landscape and visual elements of the PEIR and subsequent scope of the LVIA chapter is generally aligned with the scoping report and scoping opinion, as well as other AAH comments (*AAH TM01, AAH TM02* and *AAH TM03*), and meetings/workshops held with the Applicant.

2. Para. 2.1.9. of the PEIR clarifies that the *"National Grid Navenby Substation and National Grid connecting towers no longer form part of the Proposed Development".* Therefore, the PEIR has accounted for a grid connection corridor to this National Grid Substation, and subsequently the site boundary has been amended since the scoping opinion and report were issued, however the PEIR states that the *"Proposed Development remains materially the same"* than that subject to the scoping opinion. Para. 2.1.10. goes on to clarify further that the National Grid substation is *"not now proposed to form part of the Springwell DCO application and consent",* and will be applied for separately.

   However, as these elements are interdependent and operationally 'indivisible' from the scheme as well as currently planned to be in close proximity, we expect the LVIA will incorporate a **cumulative assessment** (PINS advice note 17) of the scheme along with the National Grid Substation in the northern area of Springwell West. Viewpoints have been identified previously in an attempt to ensure these potential cumulative views are captured, however these should be reviewed if more information becomes available.

3. As outlined within Chapter 1 (para. 1.14), the PEIR *"does not represent the final design"* and Chapter 2 of the PEIR clarifies that the development proposals are still being developed and finalised. This includes the type of PV panel and location of taller/larger elements such as project substations, satellite collector compounds and battery storage. While it is understood that some aspects of the scheme cannot be confirmed at this stage as they would be dependent upon individual contractors selected at the tender stage (para. 2.1.3) we would expect a reasonable design fix for the final ES and subsequent application which would clearly set out the parameters of the development, such as heights and locations of elements that have been used in the assessment, which if there are still some outstanding design and layout elements to be finalised would be based on a '*worst case*' scenario to ensure any effects are not underplayed. This is particularly important for larger and taller elements.

4. It is requested that further landscape and visual consultation is carried out between AAH/LCC/NKDC and the Applicant following the conclusion of this second formal consultation phase. This would likely cover the PEIR comments as well as development proposals and mitigation scheme, including any cable route corridor and location of any larger structures or buildings such as the project substation, extent of vegetation loss for highways works, and also subsequent knock-on effects such as any requirement for additional viewpoints or visualisations.

5. Notwithstanding other comments made on the overall scheme, Springwell West is likely to be of particular concern in regards to landscape and visual matters, being located within a much more open landscape with development currently illustrated in close proximity to visual receptors (particularly the A15). We have briefly summarised what the NKDC LCA 2007 says about the Limestone Heath/A15 area 'baseline' for consideration (paragraph refences provided):
    - Utility Infrastructure, which although sparse, makes an impact on the landscape including prominent pylons and the main A15 running north to south. (8.1)
    - The ridges and dips run in an east-west direction following shallow 'dry' valleys, and this is particularly apparent when travelling along the A15 which falls and rises with the topography (8.1.3)
    - There are extensive 360° views throughout the sub-area afforded by the generally low relief, large field size and absence of field boundaries. The sense of relative elevation is obvious and the general lack of tree cover or other features accentuates the feeling of exposure and emptiness. (8.1.3)
    - Obtrusive infrastructure elements are present in the two lines of large pylons and high voltage electricity cables running across the landscape to the eastern fringe of the area and also across its south-west quadrant. (8.1.11)
    - The road pattern is distinctive with the straight main road (A15) running from north to south (Lincoln to Sleaford) dividing the character sub-area in two and acting as a central communications spine (8.1.14)

B. Detailed Comments on PEIR Volume 1: Report:

1. In regards to the landscape and visual matters of the design proposals (**Chapter 2 of Volume 1**), comments are as follows:
    - As stated in previous correspondence (refer to *AAH TM02*), at this stage, we do not have details on the final location and appearance/extent of taller/larger elements that form part of the development. However, Para 2.3.2 clarifies that *"it is the Applicant's intention to use the 'Rochdale Envelope' approach within parameter ranges"*. This is a reasonable approach and has been utilised recently on other NSIP solar schemes within Lincolnshire, with the scheme design accommodated within certain limits and parameters, allowing for flexibility and likely significant effects to be presented as a reasonable *'worst case'*.
    - However, while the '*Rochdale Envelope'* approach is reasonable for the PV panels, which are identified within Table 2.1 as being up to 3.5m high except in areas of flood risk which will be at 4m AGL, we have concerns in regards to the larger and taller elements, such as project (or '*Springwell*') substation and associated offices and structures (up to 12m in height), switchgear (up to 6m in height) Collector Compounds (up to 6m in height), BESS (up to 6m in height) and more conspicuous elements. The final location and layout of these elements will likely have greater visual effects in this open, rural landscape than PV panels.
    - Therefore, we would expect the location and '*worst case'* extent (footprint or extent of layout) of these elements to be identified clearly within the ES and submission documents, through works plans and/or parameter plans, and clearly identified for the LVIA to allow for a better understanding of the potential landscape and visual effects, and ZTV figures produced on the worst-case parameters.
- Section 2.8 provides further detail on the project substation, with the potential locations presented in Figure 2.3 showing the area to the north west of '*Springwell West'*. The location of this large element (Table 2.5 identifying the compound at approximately

62,500m² with a height up to 12m AGL) is in a relatively open landscape and its positioning, detailing and subsequent secondary mitigation will need careful consideration. However, through working with the Applicant on viewpoint locations we have pre-empted this and selected viewpoints to cover this area for any visual assessment. However, subject to the final location and any changes to the design parameters, additional viewpoints may be required. We would welcome further discussion in regards to the siting of this element as designs progress.

- Regarding Overhead/ground lines: Could it be clarified if any above-ground lines and associated poles are proposed. Paragraph 2.9.18 identifies some cabling above ground (between modules and inverters) on site, and further detail would be required to understand the potential visibility of these.

- Regarding fencing and security (paras. 2.10.1 to 2.10.8), the use of palisade fencing should be avoided or minimised in favour of less visually intrusive fencing where possible. Deer-proof fencing up to 3m in height is identified in Table 2.8 to be installed around operational areas, however experience has shown that operational areas often require weld mesh security fencing (or similar) which can be much more visually intrusive than deer-proof fencing, and can be more '*urban*' in character affecting rural characteristics of the existing landscape character. While we understand the fencing height of 3m is the maximum, this is a relatively high fence and we would seek for the maximum height to be reduced to be closer to 2.4m maximum, or lower if possible.

- Paragraph 2.10.5 identifies pole mounted CCTV at a maximum height of 5m. These elements, at regular spacing around perimeters can appear quite jarring, being out of character and the regular spacing appearing incongruous with a more natural context, being a regularly repeating element appearing above boundary hedgerows. We would welcome proposals that would reduce the height and spacing of these features, and encourage design solutions and locations that would be less visible.

- Regarding above ground drainage features (drainage covered in paras. 2.10.9 to 2.10.14), these should be utilised to be as multi-functional as possible while embodying SuDS principles, coordinating their design between civil engineers, ecologists and landscape architects to exploit opportunities for additional habitat creation, as well as surface water retention.

- Regarding vegetation loss:
  - The extent of any vegetation loss to facilitate construction access or permanent site access points identified in paragraphs 2.10.16 to 2.10.19, is not identified at this stage. Also, any vegetation loss to facilitate any potential wider highways works for construction traffic, abnormal loads, plant and deliveries, is not identified. We would expect this to be coordinated with the transport assessment and any associated swept path analysis or sight line requirements and all vegetation works, including removal or pruning/trimming/crown lifting etc. to be clearly illustrated and included within any assessment as this has the potential to remove existing features (that make up the character area) and open up views into or across the site.
  - Existing breaks in field boundaries should be utilised for both construction and permanent access to minimise vegetation loss. Vegetation removal to facilitate sight line or swept path requirements should be clearly identified, and again minimised where possible.

- We would expect any proposed vegetation removal to be surveyed to *BS:5837 Trees in Relation to Design, Demolition and Construction to Construction* so it is clear what the arboricultural value is (to aid assessment) and subsequently is appropriately mitigated against if required. Retained vegetation should also be protected to *BS:5837* and full details provided.

- We welcome and encourage the development of recreation and amenity improvements and Green Infrastructure as part of the scheme, and these elements should be maximised where possible and expect this to be integrated into the entire scheme, rather than token elements that are bolted or added on to the peripheries. A continued dialogue with LCC and NKDC, as well as other interested parties in regards to these parts of the scheme is encouraged.

2. In regards to the landscape and visual chapter (**Chapter 9 of the PEIR**):

- Para. 9.1.3 clarifies that Chapter 9 is a preliminary assessment, due to insufficient information at this stage, which we would expect as this is an evolving and iterative process. The preliminary assessment is therefore based on the current parameter plans (Figures 2.4, 2.5 and 2.6 of Volume 2) and that *"a full LVIA will be presented in the subsequent ES based on the proposals comprising the DCO application."*. We request that the LVIA is explicit in regards to the development proposals it is assessing, and that the parameters are clearly defined in regards to the size/height/footprint, but also the location of both built elements and mitigation areas are fixed through parameter or works plans. These should subsequently be reflected on any visualisations or ZTV figures.

- Para. 9.2.2 identifies that consultation in relation to landscape and visual matters has been carried out, and AAH/LCC/NKDC have held meetings and workshops with the Applicant, summarised in table 9.1. Table 9.1 provides a narrative on discussions regarding viewpoints to be included within the assessment, and clarifies *"Annotated baseline photographs from the agreed viewpoints are presented in Volume 4 of this PEIR".* It is requested that further landscape and visual consultation is carried out between AAH/LCC/NKDC and the Applicant following the conclusion of this second formal consultation phase.

- Paras. 9.2.8 to 9.2.17 identify the extent of the preliminary assessment Study Area of 3km from Solar PV areas to 5km from any structures up to 12m in height. A narrative and justification of the study area is provided which is reasonable. Para. 9.2.16 clarifies that the study area will be reviewed at the ES stage, which we encourage and recommend that the LVIA Chapter should include a clear statement on the justification for the extent of the final Study Area used.

- Relevant planning policy at paragraph 9.3.2 should be updated in the DCO submission to reflect the adopted 2023 EN1, 3 and 5 Statements which came into effect on 17th January 2024. CLLP policies S53 'Design and Amenity' and S59 'Green and Blue Infrastructure Network' are not included at paragraph 9.3.3 and should be added.

Methodology:

- The methodology is provided in Section 9.4, with para. 9.4.10 clarifying that the preliminary assessment has assumed a 'worst case scenario' with solar modules at 4m in

height and a siting zone for elements up to 12m in height: *"the assessment assumes that development could be 12m in height anywhere within this zone".* Para. 9.4.11 goes on to clarify that other elements such as the BESS, Collector Compounds and Springwell Substation are included within potential siting zones, as illustrated in Figure 2.3: Zonal Masterplan, and the assessment assumes that these elements may be in any part of each zone. This provides a robust and clear approach to assessing the '*worst case scenario'* in both location and height in the absence of detailed design layouts, and we assume this approach will be carried forward to the LVIA.

- With reference to paragraph 9.4.14 the applicant should justify the choice of buffer/stand off zones and whether this is set out in guidance, good practice, precedent from other NSIP solar projects or professional judgement or a combination. The Council raises concerns at this stage regarding the suggestion of new landscaping (where appropriate) being proposed within 15m either side from existing or proposed PROW if newly planted hedgerows are then maintained at 3.5m high by ongoing management, and which might appear overbearing (pending ongoing detailed design).

- Paragraphs 9.4.15 to 9.4.44 provide an overview of the methodology, which is further detailed in Appendix 9.1. Further comments are provided on the proposed methodology under the Appendix 9.1 heading below.

<u>Identification of receptors and potential effects:</u>

- The PEIR identifies a range of landscape and visual receptors within the Study Area. The visual receptors and viewpoints were previously discussed with AAH/LCC/NKDC, as were the potential locations of viewpoints. Table 9.2 presents receptors that are proposed to be scoped out of the assessment, along with a narrative on the justification for this. This list seems reasonable, as do the justifications. However, we recommend this information is presented in the final LVIA to aid transparency, and the justifications will allow for understanding of interested parties that these elements have been considered as part of the assessment process and why they have not been brought forward to the assessment. This is particularly important for the view from villages/hamlets identified to be scoped out, despite the ZTV information presented on Figures 9.5 to 9.8, which illustrates potential visibility.

- National Character Areas (NCAs) and District Landscape Character Types (LCTs) and subsequent Landscape Character Areas (LCA) have been identified and referred to within the PEIR which cover a range of scales. We agree that there is the potential to scope out character areas that would not be affected by the development, however a clear statement as to why these have been judged to omit should be provided in the LVIA. We would not expect that National Character Areas be a receptor to be assessed as they are at a large scale and typically provide context only.

- Only two potential landscape receptors are identified for consideration in the LVIA within with para. 9.5.9 identifying: "*Springwell West and Springwell Central fall within LCA 7 - The Limestone Heath LCA whilst Springwell East falls within LCA 11 - The Central Clays and Gravels LCA."* Will the LVIA include a more local assessment? We would suggest a finer-grained character assessment is carried out and identification of individual elements or features of the landscape character areas to form the baseline.

- In regards to landscape effects, the scale or size of a character area should not be a determining factor in assessing effects. We would urge caution in regard to larger landscape character areas, which often are assessed as having limited magnitudes of change as the change would be small scale and/or extent (development site) would only affect a small percentage of the overall, much larger, character area. We would encourage the LVIA assess what the change would be in that part of the character area and what identified key elements identified within the character areas are impacted, and how development change would affect those.

- It would be useful to take into account the information collated as part of the Historic landscape characterisation project: *The Historic Character of The County of Lincolnshire (September 2011)*, to ensure that the development is sensitive to the historic landscape. The project documents and the mapping can be accessed here: Historic Landscape Characterisation – Lincolnshire County Council

- Paras. 9.5.15 to 9.5.31 describe the visual receptors to be included within, and those that are scoped out of, the assessment. These are clearly summarised and listed within Table 9.8, which also provides information on judgements of sensitivity and value. Thirty-eight viewpoints have been identified that represent the main landscape and visual receptors. The receptors and viewpoints represent those discussed and agreed to date with AAH/LCC/NKDC, however as the design is still evolving, we would suggest this dialogue continues to pick up on any changes, which may necessitate additional viewpoints or scoping in of additional receptors. Further comments on viewpoints and photography are made below.

- The Approach to mitigation and residual effects in the LVIA, outlined in paras. 9.6.8 to 9.6.12 is appropriate, and we would encourage multi discipline coordination and synergy of disciplines (e.g. heritage, ecology, civils and landscape) to provide multi-functional spaces that not only mitigate adverse effects but has the potential to enhance to local landscape (as outlined in section 9.7). AAH/LCC/NKDC are available to provide input into the process of developing mitigation as required.

- With reference to Table 9.8, additional information and justification should be provided for the B1188, B1191 roads (which are assessed as 'medium' susceptibility and sensitivity) and the A15 (which is defined as 'low'). Table 9.3 states that *"a large volume of traffic passes along these two roads which have a largely open view across part of the Site. Receptors are generally not of high sensitivity but the views are likely to be experienced by large numbers of people from these two roads"* (B1191 and A15). The A15 should therefore be reclassified, having open views across the landscape from a high number of receptors, and therefore receptors more susceptible to changes in view. On this basis the Council does not currently support the conclusion set out in Table 9.9 which suggests moderate/minor changes and no significant effects.

- The development would be set close to receptors on the A15, and located within an open landscape, and therefore conspicuous in the view, and subsequent established mitigation planting that is intended to screen proposals would likely foreshorten views, which would be a conspicuous change to the baseline. The mitigation solution along the A15 needs to be fully considered, and a balance struck between screening and integration, while respecting open views and the wider landscape character. We understand that continued

consultation with the local community is ongoing in regards to this, which is encouraged and we would welcome the opportunity to input into the final mitigation solutions. However, it is assumed that there is subsequently an error in Table 9.10 with reference to the A15 given that the operational phase assessment, with mitigation, assumes a substantial/moderate/significant effect, but assume this would be clarified following the final layout and mitigation solutions.

- Table 9.9 and Table 9.10 provide an initial assessment of likely effects at construction, operation (year 1 and year 10) and decommissioning. The layout of these tables provides a clear and accessible summary of the assessment process and the judgements made by the author. However, as the scheme is still being developed, we have not provided detailed judgements against all these preliminary findings. Though, by reason of its mass and scale, our opinion is that the scheme would likely lead to significant adverse effects on landscape character and visual amenity at all phases of the scheme. The Development has the potential to transform the local landscape by altering the character on a large-scale. This landscape change also has the potential to affect wider landscape character, by replacing large areas of agricultural or rural land with solar development, affecting the current open agricultural character.

C. Detailed Comments on PEIR - Volume 2: Supporting Figures (Chapter 9 LVIA):

1. Generally: Figures associated with the landscape and visual chapter are well presented and read well.

D. Detailed Comments on PEIR - Volume 3: Supporting Reports (Chapter 9 LVIA):

Review of Appendix 9.1 LVIA Methodology and Assessment Criteria

1. The methodology, overall, is commensurate to what we would expect to be used to assess landscape and visual effects of the proposed development.

2. Pg 3 provides an overview of the assessment of Landscape effects. This identifies that the baseline should include both *Landscape fabric/elements*; and *Landscape key characteristics*. This information should be clearly presented within the LVIA, and would expect that as well as published character assessments, a finer-grained assessment be carried out and identification of individual elements or features of the landscape character areas to form the baseline to understand how these may be affected by the development. However, if the applicant judges the published character assessments provide this information, it should be clearly stated within the LVIA, but we would still expect the key elements of the landscape be identified as part of these overall receptors.

3. Pg 9 and 10 provide narrative on the Significance of Landscape and Visual Effects, and we support the approach that effects classified as '*Major or Major/Moderate'* are likely significant effects and that for '*Moderate*' effects, professional judgement will be applied. However, where Moderate effects have been deemed '*not significant*' we request a brief narrative accompanies the judgement to allow for transparency as typically effects of this magnitude are deemed *'significant'*.

4. Visualisations are shown as Type 1 in the PEIR. We recommend further consultation to agree the number (location) and Type of Visualisations to be included within the LVIA that would

be most appropriate to illustrate the proposals. We will expect there to be a number of Type 3 and possibly Type 4 visualisations provided within the LVIA and ES – these will be important to illustrate the scheme and the effectiveness of any mitigation, particularly to members of the community. A clear Visualisation Methodology should also be included. This should provide full details/parameters of the elements that have been modelled (Solar arrays, substation etc.) for transparency of what is being illustrated, and enable this to be referenced against the 'worst case' design parameters (e.g. if shown at maximum heights, or lower than maximum provided in design parameters).

Review of Appendix 9.2 Extracts from Published Landscape Character Assessments:

5. No further comments on the published landscape character assessments at this stage.

Review of Appendix 9.3 Landscape Sensitivity Appraisal

6. No comments on the Landscape Sensitivity Appraisal at this stage, however we refer back to our previous comments regarding the landscape baseline only covering the two relevant published LCA, however "*observations made in the field during the baseline assessment of landscape character"* is noted as included within the baseline assessment of sensitivity.

Review of Appendix 9.4 Preliminary Viewpoint Analysis

7. No further comments on the Preliminary Viewpoint Analysis at this stage.

Review of Appendix 9.5 Preliminary Residential Visual Amenity (RVA)

8. With reference to RVA:
   - Tables 9.9 and 9.10 note that for *'Individual/ Isolated Residential Properties'*, and adopting a '*worst case'* scenario, at this stage it is assumed that there may be up to a substantial magnitude of change at a small number of individual isolated properties potentially give rise to a significant effect even after mitigation. These properties should be clearly identified on submitted plans and addressed in the ES chapter.

   - The Appendix 9.5 Preliminary Residential Visual Amenity Assessment makes reference to a figure 9.11, however it is assumed that this is actually figure 9.9. The Appendix 9.5 RVA states that there is no standard criteria for defining a RVAA study area and this is determined on a case by case basis. It quotes TGN 02/19 guidance which states that *"other development types including potentially very large but lower profile structures and developments such as road schemes and housing are unlikely to require RVAA, except potentially of properties in very close proximity (50-250m) to the development."*

   - Figure 9.9 then illustrates a study area drawn from TGN 02/19 guidance which identifies properties within 200m of any Solar PV development; 400m of any siting zones for structures up to 6m and 800m from any siting zones for structures up to 12m (i.e. including the siting zones for the project substation). Table A9.5-2 '*Preliminary Analysis of Residential Properties within RVVA Study Area'* then sets out initial observations of impact for 23 properties or grouped properties based on the application of the 200m/400m/800m buffer and siting zones.

   - However, cross reference to the Heckington Fen solar NSIP 'Volume 1: Technical Chapters Chapter 7: Residential Visual Amenity' notes that an initial 1km area from the order limit boundary was adopted. Paragraph 7.5.1 of that document notes that design mitigation

measures included providing increased physical separation from nearby residential properties to the closest panelled areas (initially located 200m from the receptor) to *'avoid the risk of failing the so-called 'Lavender* Test'. With one exception (separation distance of 140m to panelled areas), the closest panelled areas at Heckington Fen are now no closer than between 240m-270m to the nearest residential property (NKDC Local Impact Report – paragraph 13.9).

- Whilst it is accepted that each case must be assessed on its own merits, the Council is concerned that the draft RVA has adopted a much narrower assessment buffer, down to 200m, than initially presented at Heckington Fen. There is nothing in the draft RVA which makes the link between the TGN 02/19 guidance, solar development and the Springwell project. The examples given in the TGN 02/19 guidance are for road and housing projects. We accept that the guidance cannot be exhaustive however these proposals are of a significantly greater scale and footprint that the examples given in the guidance note and as set out in the Councils scoping response a concern here is the degree to which certain properties or zones might have limited visual relief from the development; even with the amendments to the zonal masterplan and the buffer adopted.

- Noting the minimum separation distance of the bulk of residential property at Heckington Fen, there are a number of properties confirmed through the Springwell RVA and Figure 9.9 which are less than (or on the cusp of) 200m from the closest panelled areas. Some are much closer, namely 1 & 2 Peacock Lodge Cottages, Tollbar Cottage, Lupus Lair, 1-2 Ashby Lodge Co□age, Sheffield House, Scopwick Low Field Farm, Brickyard Farm and RAF Digby Mallory Road.

- Table A9.5-2 'Preliminary Analysis of Residential Properties within RVVA Study Area' proposes to scope out assessment on 6 of the 23 named properties/groups of properties however this is on the basis of initial assessments whose detail is not presented in the draft document. This could have included images and close up mapping extracts where necessary annotating the layout of dwellings, the direction of outlooks, location of existing landscape filters etc. Therefore, from the information presented the Council cannot yet agree that these properties should be scoped out, and as above there remain a large number of properties at closer physical proximity/with lesser separation that at Heckington Fen which as above typically achieved a 250m-270m separation and where the TGN 02/19 guidance gives an outer range of 250m albeit for road and housing projects.

E. <u>Review of Volume 4 - Landscape Viewpoints:</u>

1. Thirty-eight viewpoints have been identified and presented that represent the main landscape and visual receptors. The receptors and viewpoints represent those discussed and agreed to date with AAH/LCC/NKDC, however as the design is still evolving, we would suggest this dialogue continues to pick up on any changes, which may necessitate additional viewpoints or scoping in of additional receptors.

2. The photographs presented are clear, well labelled and the indication of siting areas aids legibility. The legibility is aided with colour coding of the three different Springwell areas (West, Central and East). This would be useful to carry through to the LVIA.

3. VP30: View may provide more indication of visibility of elements up to 12m in height in siting area if either rotated to the right, or if extended (additional sheet) to capture more of the western extents. These are potentially large components, and the context would also be useful to include within the view.

4. VP31: While a long-distance view, this viewpoint is towards the siting area – could this be labelled and also would an additional sheet to the left of the view be required to capture this? The potential height of 12m of these elements may be visible, as illustrated on the ZTV.

[redacted]
AAH Landscape

[redacted]

19th February 2024

AAH consultants

Technical Memorandum 5: AAH TM05

North Kesteven District Council and Lincolnshire County Council: Springwell Solar Project

Visual Amenity: Final Viewpoint Comments

A meeting was held between representatives from AAH, Lincolnshire County Council (LCC) and North Kesteven District Council (NKDC) with the applicant on 19th June 2024, to discuss final viewpoint selection and photomontages. Following this, the applicant forwarded an email on 26th June with a list of proposed locations for photomontages, an updated ZTV, a plan of all proposed viewpoints and several additional alternative viewpoints for the final Springfield ES with a view to reach agreement.

Therefore, we have the following comments and requests:

1. The overall viewpoint selection is appropriate and we are happy with the viewpoints selected to be taken through to the LVIA chapter of the ES;

2. Viewpoint 30 may benefit from either being rotated to the right, or additional sheets to capture any cumulative views or the NG substation and BESS.

3. Regarding potential additional viewpoints J4 or J5, to the south west of the scheme and NG Substation: We would suggest taking viewpoint J5 through to the LVIA chapter of the ES as it provides a more panoramic view and may include cumulative views of the development alongside higher elements of the NG substation and proposed BESS to the north, and therefore suggest the view is either rotated or expanded to include views towards these elements. We also agree that a visualisation from this viewpoint would be useful;

4. We agree that Viewpoint J3 should replace Viewpoint 37;

5. Regarding Viewpoint J1, while we are generally in agreement that there are unlikely to be views of the scheme, it is likely that at the examination stage there would be queries in regards to views of the scheme, and in particular cumulative views with the NG substation and BESS scheme, so would suggest it is kept in the LVIA to clearly demonstrate this view has been considered.

6. Regarding proposals for viewpoints to be illustrated as Year 1 and Year 10 photomontages:
    A. We are generally happy with the selected views and these provide a good variety of views and location; however
    B. The views proposed are predominantly very close to panels, so would suggest that a couple of visualisations that are slightly more offset from the redline are provided to illustrate how the solar development will appear in the wider landscape. This would be particularly useful from VP 13 and 14 as these views are offset slightly and show a wider context, as well as capture views that are more sensitive in relation to heritage assets (edge of conservation area). VP 13 would likely benefit from the inclusion of views towards the settlement of Blankley and the church by rotating or adding an additional sheet.
    C. Viewpoint 27 has the potential to be developed as a visualisation as it shows a more panoramic, elevated longer-range view and several development parcels. However,

we would also suggest an additional sheet is provided that includes the coloured areas (as currently presented) demarking development as these provide an effective way of identifying development areas, which may appear as grey masses on any visualisations.

[redacted]
AAH Landscape

[redacted]

10th July 2024

APPENDIX B

Landscape Institute Technical Guidance Note 1/20 (10 Jan 2020): Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)

Landscape Institute Technical Guidance Note

Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)

Technical Guidance Note 1/20 (10 Jan 2020)

The purpose of this guidance is to establish a framework for carrying out reviews of LVIAs and LVAs, analysing in a structured and consistent way if the assessment reflects the approach advocated in GLVIA3 and has led to reasoned and transparent judgements. Use of this framework should in due course further raise the standard of assessments

1. Introduction

The third edition of the *Guidelines for Landscape and Visual Impact Assessment* (GLVIA3) was published in April 2013. It has been widely welcomed, accepted and adopted for use in assessing the effects of projects on landscape and visual amenity and since publication been promoted by Landscape Institute (LI) training events.

GLVIA3 sets out that assessment of effects on the landscape and visual resource that may result from a development proposal may be undertaken formally as Landscape and Visual Impact Assessment (LVIA) typically as part of an Environmental Impact Assessment (EIA) or less formally as a Landscape and Visual Appraisal (LVA). The LI strongly recommends that GLVIA 3 is followed when undertaking these assessments and that the resulting LVIAs and LVAs should be objective with clear thinking, easy to follow, and demonstrate how they have informed appropriate siting, design, and mitigation.

The main difference between an LVIA and LVA is that in an LVIA the assessor is required to identify 'significant' effects in accordance with the requirements of Environmental Impact Assessment Regulations 2017, as well as type, nature, duration and geographic extent of the effect whilst an LVA does not require determination of 'significance' and may generally hold less detail.

In the case of LVIAs, The Regulations have further implications for landscape professionals:

- Reg. 18 (5) stipulates that the developer must ensure that the ES is prepared by '*competent experts'* and that the developer must include a statement "*outlining the relevant expertise or qualifications of such experts".*

- Reg 4 (5) places obligations on the relevant planning authority or the Secretary of State because they "…*must ensure they have, or have access as necessary to, sufficient expertise to examine the Environmental Statement."*

Note that the terms 'competent expert' and 'sufficient expertise' are not defined in the EIA Regulations. The Landscape Institute, in the absence of formal certification of specific competence, considers that a 'competent expert' would normally be a Chartered Member of the Landscape Institute who, has substantive experience of undertaking and reviewing LVIAs. This may be evidenced by the assessor's CV, by reference to previous assessments, and by endorsement by other senior professionals.

Following on from GLVIA3, which focusses on how to *undertake* LVIAs/LVAs, this document provides guidance on how to *review* LVIAs or LVAs prepared by others. Such review may be undertaken from within the organisation which produced the LVIA/LVA, e.g. as part of a QA process, or by third parties on receipt of LVIAs and LVAs, such as landscape and or planning professionals in public sector bodies.

This guidance sets out a framework for carrying out such reviews in a structured and consistent way that reflects the approach to assessment advocated in GLVIA3 and use of it should further raise the standard of assessments.

2. Existing advice and guidance

GLVIA3 Chapter 8, under the heading "Review of the landscape and visual effects content of an Environmental Statement", says:

"8.35 Competent authorities receiving Environmental Statements will often subject the documents to formal review of both the adequacy of the content and of their quality. The review process will usually check that the assessment:

- *meets the requirements of the relevant Regulations;*
- *is in accordance with relevant guidance;*
- *is appropriate and in proportion to the scale and nature of the proposed development;*
- *meets the requirements agreed in discussions with the competent authority and consultation bodies during scoping and subsequent consultations.*

8.36 The summary good practice points in this guidance should assist in review of the landscape and visual effects content of an Environmental Statement. In addition, several existing sources may also help anyone involved in reviewing this topic to decide what to look for:

- *IEMA has developed a series of general criterial for reviewing Environmental Statements and registrants for the EIA Quality Mark*[1] *must meet the criteria…*
- *The former Countryside Commission published criteria for reviewing the landscape and countryside recreation content of Environmental Statements…*
- *Appendix 1 of Scottish Natural Heritage's Handbook on EIA* [2]*contains useful tests to help judge the landscape and visual effects content of Environmental Statements…"*

In addition, European Commission guidance on ES review[3], published in 2001 and, although directed at whole ES review rather than topic specific review, has also provided useful pointers.

This review framework has been developed in this context.

[1] IEMA EIA Quality Mark, IEMA website: https://www.iema.net/eia-quality-mark [accessed 200110]

[2] Scottish Natural Heritage, A handbook on environmental impact assessment v5, 2018, SNH website: https://www.nature.scot/sites/default/files/2018-05/Publication%202018%20-%20Environmental%20Impact%20Assessment%20Handbook%20V5.pdf [accessed 200110]

[3] European Commission, Guidance on EIA-EIS Review, Luxembourg: Office for Official Publications of the European Communities 2001 ISBN 92-894-1336-0, EC website: http://ec.europa.eu/environment/archives/eia/eia-guidelines/g-review-full-text.pdf [accessed 200110]

3. Carrying out the review

There are three main components of a review of a LVIA or LVA leading to a report containing the overall conclusion in respect of the completeness, competency and reliability of the LVIA/LVA.

1. **Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;**
2. **Checking the baseline, content and findings of the assessment;**
3. **Checking the presentation of the assessment findings.**

As a starting point when undertaking a review, the reviewer will need to define the structure and process to be followed by for example setting out a set of headings or questions against which the LVIA or LVA is examined. Setting out standard or systematic questions will allow consideration being given to each step and each element covered in the assessment. The "good practice" bullet points at the end of each chapter in GLVIA3, noted above, may provide a starting point for such an approach. It is also important to bear in mind the principle of proportionality (cf. EIA Directive). Both the LVIA (or LVA) and the Review should have a defined scope and level of detail which is proportionate and reasonable to allow an informed decision to be reached.

In order to improve consistency and quality of reviews of LVIAs and LVAs the Landscape Institute has produced this framework. Those who undertake reviews should follow this framework and modify or adapt the framework to the Review being carried out and set out the reasons for such modifications.

Step 1. Checking methodology, criteria and process

In this phase, the reviewer will check the methodology, scope and process used in the assessment and how these relate to GLVIA 3. This involves reviewing the following:

a) Does the scope of the assessment meet the requirements set out in the Scoping Opinion and/ or as defined in the LVIA or LVA and if substantively different, are the reasons clearly set out and explained?
b) What consultations have been carried out and have responses been acted upon?
c) Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?
d) As part of the methodology, has the terminology been clearly defined, have the criteria to form judgements including thresholds been clearly defined and have any deviations from good practice guidance (such as GLVIA3) been clearly explained?
e) Does the assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?
f) Does the assessment demonstrate comprehensive identification of receptors and of all likely effects? and
g) Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?

Step 2. Check the baseline, content, and findings of the assessment

As part of this stage in the review process the reviewer will consider the description of the baseline, both in narrative as well as in illustrations by plans, photographs and drawings etc. This may also include publicly available aerial photography, books, online resources, local plans and management plans.

The reviewer may also consider that a site visit may be necessary either to complement or to verify baseline information. The site visit and potential visits to viewpoints are also useful to check actual findings of the assessment.

This stage of the review typically includes further tests:

a) What is the reviewer's opinion of the scope, content and appropriateness (detail, geographic extent) of both the landscape and the visual baseline studies which form the basis for the assessment of effects (supported by appropriate graphic such as ZTVs etc as appropriate)?
b) Has the value of landscape and visual resources been appropriately addressed (including but not necessarily limited to) considerations of: local, regional and national designations; rarity, tranquillity, wild-land and valued landscape?
c) Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change have been clearly and objectively defined, avoiding scales which may distort reported results?
d) How well is the cross-over with other topics, such as heritage or ecology, addressed?
e) Is there evidence of an iterative assessment-design process?
f) Is it clear how the methodology was applied in the assessment, e.g.: consistent process, use of terms, clarity in reaching judgements and transparency of decision-making?
g) How appropriate are the viewpoints that have been used?
h) How appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?
i) What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the project, the degree/nature of effects, and the approach to judging the significance of the effects identified, in the case of EIA projects?
j) What is the opinion on the volume, relevance and completeness of the information provided about the development or project including, where relevant, detail about various development stages such as construction, operation, decommissioning, restoration, etc.?
k) Does the document clearly identify landscape and visual effects which need to be considered in the assessment? and
l) Have levels of effect have been clearly defined and, in the case of LVIA, have thresholds for significance been clearly defined and have cumulative landscape and visual effects been addressed?

Step 3. Critique of the presentation of the findings of the assessment

This phase is perhaps the most straightforward. It involves examining the 'presentation' of the assessment including report text, figures/ illustrations, visualisations, and other graphic material forming the LVIA or LVA, and answering the following:

a) Does the LVIA/ LVA display transparency, objectivity and clarity of thinking, appropriate and proportionate communication of all aspects of the assessment of landscape and visual effects, including cumulative effects.
b) Have the findings of the assessment been clearly set out and are they readily understood?
c) Has there been clear and comprehensive communication of the assessment, in text, tables and illustrations?
d) Are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?
e) Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards? and
f) Is there a clear and concise summation of the effects of the proposals?

Overall Conclusion: Report the review

The final step of the review process is to use the reviewer's findings to draft a short report which would include (but need not be limited to):

1. Confirmation of the brief issued to the reviewer setting out the scope of the review;
2. A summary of how the review was undertaken);
3. A summary of findings of the review of the assessment methodology;
4. A summary of findings of the review of the scope of the assessment;
5. A summary of findings of the review of the actual assessment of effects;
6. A summary of findings of the presentation of the assessment;
7. A summary statement by the reviewer in respect of appropriateness, quality, comprehensiveness, compliance and conformity with relevant guidance and regulations;
8. Recommendations for further information to be sought (if necessary); and
9. Overall conclusions on the adequacy of the assessment and whether it is sufficient to support making an informed planning decision.

The report can also include further information not covered here but relevant to reporting on the compliance (or otherwise) of the LVIA or LVA with GLVIA3 or matters of competence or expertise. This guidance provides a summary framework for reviewing and reporting only; the Landscape Institute continues to regard GLVIA3 as the primary source of guidance for undertaking LVIAs and LVAs.

4. Further information

For further information or to provide feedback on the guidance in use, please refer to the Landscape Institute's website, using the search terms GLVIA. At the time of publication, material is likely to be found in the following section: [redacted]

Authored by Mary O'Connor FLI on behalf of the GLVIA Panel and approved by LI Technical Committee
Nov 2019

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[redacted]

Document history
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Appendix B

Comments on Public Rights of Way and the Outline Public Rights of Way and Permissive Path Management Plan.

Outline PRWPPMP Paragraph	Comments
1.4.1	Bridleway definition does not include the right for cycling (granted by Section 30 Countryside Act 1968)
3.2.1	"Temporarily extinguish" should be changed to "Temporarily close"
3.2.4	The PROW team (as part of the Highway Authority) needs to be included here.
3.4.1	The agreement needs to be with the highway authority
3.4.4	Not clear what local management means - this paragraph needs additional clarification.
3.5.1	Agreements for closure need to be undertaken by the Highway Authority. LCC appreciate the reference to planning authority means the Council as well but it is the highway authority function that approves closures etc.
3.5.2	LCC agree with the 6 months limit but the short temporary closures should only be where it is necessary for the works and be reopened after. It shouldn't be left closed where no works are happening in the area.
3.7.4	Highway authority needs to be included.
5.1.2	PROW alignments would not be able to be changed without a legal order or as part of the DCO. Permitted paths are flexible and do not require formal authority to change.
Plate 3.1	It would be helpful to make clear that the enhanced PROW here (PF 737) is proposed to be upgraded to a bridleway.

Dedication of new rights of way	LCC recommend that the DCO includes the dedication of the new public footpaths and the dedication of bridleway rights along Scopwick PF 737. This will then fold the dedication into the wider legal event to support the change of the Definitive Map and avoid the need for separate deeds of dedication.

Appendix C

Review of Soil and Agricultural Land Classification for Springwell Solar Project

January 2025

Review of Soil and ALC for Springwell Solar Project (LIR)

On behalf of North Kesteven Council

LANDSCOPE
LAND & PROPERTY

Summary of Situation

I have considered the three agricultural land classification reports for each of the three main areas of the site, together with the outline soil management plan and various other documents

The ALC land surveyed represents a total area of 1,620.9 hectares across 3 locations Eastern, Central and Western and Cable Corridors. It is mostly in the ownership of one landowner, a major estate in the locality with significant farming interests. The overall ALC results will feed into the baseline data on soils and agriculture, as set out in Chapter 11 of the Environmental Statement.

The ALC reports have been undertaken by a professional team in agreement with Natural England and the results are considered reliable. The oSMP should deal with construction, operation and decommissioning concerns. Land drainage is always an issue to consider on the heavier soils, but a plan is in place.

Agricultural Land Classification Summary of The Three Sites

Eastern Area
A total area of 431 hectares, Grade 1 23.8 (5.5%) Grade 2 75.3 (17.5%) Subgrade 3a 168.6 (39.1%) Subgrade 3b 163.3 (37.9%)

Western Area
A total of 932.6 hectares, with 60.4 ha (6.5%) of Grade 2, 377.5 (40.5%) of Grade 3a and the remainder 494.7 ha (53%) Grade 3b. A total of 47% BMV.

Central Area
257.3 hectares Grade 2, 44.2ha (17.2%) Subgrade 3a 138.1 (53.7%) Subgrade 3b 70.8 (27.5%) Grade 4 4.2 (1.6%)

All the ALC surveys were conducted in line with guidance and at 1 auger per hectare.

BMV Summary
Split of BMV vs non-BMV, is 733 hectares non-BMV (45.22%) and 887.9 (54.77%) BMV.

The total area proposed under panels is 591 hectares (as per Table 11.13). The proportion of BMV is reduced to 35.6% (210.7Ha) under panels and other infrastructure.

An outline Soil Management Plan (oSMP) has been prepared following consultation with Natural England and Stakeholders including local authorities.

At the end of the scheme some BMV land will be retained permanently in Green Infrastructure.

1. The Site and Proposal

The Proposed Development comprises the installation of solar photovoltaic (PV) generating modules, battery storage facilities, and grid connection infrastructure with a capacity in the region of 800MW.

The Site is located within the administrative boundary of North Kesteven District Council, in the county of Lincolnshire. The ALC survey area measures approximately 1,620 hectares (ha) and extends across three distinct parcels (referred to as Springwell West, Springwell Central and Springwell East). The Order Limits area is 1,280 hectares and the site boundary and three land parcels are presented in **Appendix 1**.

2 Background to Soils and Agriculture

A meeting was held with Natural England in September 2023 to discuss the initial agricultural land classification survey and the consideration of Best and Most Versatile (BMV) land in the development of the design. Natural England requested an agricultural land classification survey to be undertaken of the proposed cable route locations connecting each parcel to help inform the management requirements of the soil and for additional survey work on the three main sites. A detailed agricultural land classification survey has been undertaken in order to assess agricultural classification within the Site, including all of the cable routes. This survey has informed the design-development and the outline Soil Management Plan (oSMP).

3 Agricultural Land Classification

In the review of Scoping we stated:-

The ALC should identify where BMV land is and the scheme should seek to protect and minimise damage to higher grade land wherever possible in line with national planning policy. There is undoubtedly a lot of BMV land in this vicinity and only a full ALC will identify where it is and what the Grade and quality is. Laboratory analysis of representative samples should be used to determine textures.

Table 11.11 below shows the stated breakdown and make-up of the different Grades of land, within the Order Limits. The total area extends to 1,280 hectares which is less than the 3 ALC reports of 1,620 hectares. Around 360 hectares have been surveyed outside (but adjoining) the scheme. These areas are shown on the Plan (**Appendix 1**) outside of the red line of the Order Limits. Some of those areas represented alternative Cable Route corridors and are now 'excluded' though the ALC results are shown on the ALC plan **Appendix 2**.

Table 11.11 Agricultural land classification results of the Order Limits

Agricultural land classification grade	Area (ha)	Percentage (%)
Grade 1	6.0	0.5
Grade 2	80.1	6.3
Grade 3a	455.1	35.6
Grade 3b	582.6	45.5
Grade 4	4.2	0.3
Unsurveyed land (field verges, internal tracks, etc)	152.0	11.8
Total BMV	541.2	42.3
Total non-BMV	586.8	45.9
Total	**1280.0**	**100.00**

The actual area proposed for panel and related development is set out in Table 11.13 below. All of the Grade 1 land has been excluded from development and most of the Grade 2 area within the Order. The total BMV 'take' for the solar development is now 210.7 hectares (35.6%).

Table 11.13 Agricultural land classification results of the area of Solar PV development

Agricultural land classification grade	Area (ha)	Percentage (%)
Grade 1	0	0
Grade 2	14.3	2.4
Grade 3a	196.4	33.2
Grade 3b	376.4	63.7
Grade 4	4.2	0.7
Total BMV	210.7	35.6
Total non-BMV	380.6	64.4
Total	**591.3**	**100.00**

NB: The percentage column indicates the percentage of agricultural land classification grade within the Solar PV development area, not the percentage of agricultural land classification grade within the Order Limits.

The ES states:-
*11.5.29 The potential use of BMV land has been a key consideration in the development of the design, as discussed in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** and several fields have been removed due to them being classified as high grade BMV agricultural land.*

4 Soil Management Plan

Soil structure can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect the panels and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction but not all and it is possible that long term drainage issues occur on the site due to the construction.

Soil Damage During Construction

Soil structure can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect the panels and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction but not all and it is possible that long term drainage issues occur on the site due to the construction.

The oSMP now includes the cable route in order to minimise the impact on soil structure, land drainage and ultimately soil quality. Further guidance is available in published documents.

11.8.4. The oSMP [EN010149/APP/7.11] sets out the measures to manage any potential impacts to the soil and agricultural land during the construction phase, and is secured by a requirement in the Draft DCO [EN010149/APP/3.1]. The oSMP [EN010149/APP/7.11] identifies those areas within the Site which may be more susceptible to damage, and it advises on when soils are suitable for being handled or trafficked. The oSMP [EN010149/APP/7.11] also details measures for soil management and follows the principles of best practice to maintain the physical properties of the soil, with the aim of restoring the land to its preconstruction condition following the temporary construction use and at the end of the lifetime of the Proposed Development.

Cumulative Impact at District and County Level

The scale of the project and the amount of BMV land, I consider makes the impact significant at both District and County level. The information argues that the area of amounts to only 1% of the farmed area of Lincolnshire. However, the cumulative effect is significant for Lincolnshire and the District. There are a several other large solar schemes proposed or approved across the wider area that contribute to this impact.

For a project of this scale there is an impact the project will tie up the land for up to 40 years, there will be some impact. The loss of such a large area of land would normally be considered as significant at District level, even though the use is 'temporary'. Any permanent loss of land due either to construction or through biodiversity designation may affect this assessment.

The ES states:-
11.5.28. Agricultural land quality is referred to in the National Policy Statement for Renewable Energy Infrastructure (EN-3) [Ref. 11-8] and it notes that lower quality agricultural land, should be preferred, avoiding BMV land "where possible". The Proposed Development would not be deliverable without the temporary use of some BMV land.

11.6.3. In addition, the Applicant sought to work with the landowners to understand relative productivity (including accessibility) of the land to focus on areas of land with poorer yield and to determine if fields that were discounted for development would be suitable would be accessible for continued agricultural use.

Across Lincolnshire the estimated proportion of BMV is 71.2%; across North Kesteven the proportion of BMV at 67% is slightly lower than the Lincolnshire average, but this still covers two thirds of agricultural land, and is well above the national average.

Table 16.4: Area and Proportion of Lincolnshire and North Kesteven

ALC Grade (pre 1988)	Lincolnshire		NKDC	
	Area (ha)	%	Area (ha)	%
1[1]	82,600	14.6	1,260	1.4
2[2]	203,600	36.0	39,830	44.9
3a[3]	116,700	20.6	18,340	20.7
3b	155,900	27.5	28,220	31.8
4	7,400	1.3	1,130	1.2
5	0	0	0	0
Total	566,200	100.0	88,780	100

1 75,757 x 1.09
2 186,752 x 1.09
3 296,243 x 0.394

Table 11.14 of the ES states:-
Fields comprising solely of Grade 1 or 2 land within the Site will remain available for arable production. The design and layout seeks to minimise disturbance to agricultural land of BMV quality. Where possible, existing access tracks within the Order Limits will be used, and new access tracks will avoid BMV land as far as is practical.

Solar PV mounting structure foundations will be driven or helical piles or concrete footings.

The foundations for the Solar PV modules will be at a maximum depth of 3m, depending on the ground conditions.

Construction Methodology Decommissioning and Land Use

Construction

The ES states:-
11.7.4. Construction activities, including trafficking of agricultural land by construction vehicles, formation of construction compounds, installation of the cable route and earthworks may lead to compaction and deterioration of soil and agricultural land during the construction phase.

11.7.5. Access tracks and steep slopes within the Site are likely to be most susceptible to deterioration through erosion.

11.7.6. Some soil types are more susceptible to damage when handled during construction, and due to the use of machinery and vehicular activity, depending upon soil type, climate and wetness class.

Operation

The ES states:-
11.7.10. With respect to soil and agricultural land, there is anticipated to be limited ground disturbance or trafficking over the soil, apart from periodic maintenance requirements, including replacement of damaged parts or cleaning and maintenance of the Solar PV modules, as described in ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1].

11.9.11. Soil and agricultural land on the Site are classified as very high (grade 1 and 2 land), high sensitivity (grade 3a) and medium sensitivity (grade 3b land). It is considered that any impact as a consequence of construction activities will at worst lead to a temporary reduction in availability of agricultural land, with no discernible change in soil quality or agricultural land classification grade. The potential for damage to field drains (with possible subsequent effects on drainage of agricultural land) will be managed by the oCTMP [EN010149/APP/7.8]. The area within the Order Limits that is classified as BMV land is 541.2 ha (42.3%). Therefore, given a temporary and reversible reduction in availability of agricultural land and the additional mitigation proposed, the magnitude of impact is minor. The significance of effect is therefore determined to be moderate or large adverse for very high sensitivity soils, slight or moderate adverse for high sensitivity soils and slight adverse for medium sensitivity soils. As the higher of these effects has a split significance range, professional judgement has been applied, based on the information provided in the preceding sections. Given that the quality of the soil, and the agricultural land classification grade, will not be changed by the Proposed Development (with works all being completed in accordance with the oSMP [EN010149/APP/7.11] and oCEMP [EN010149/APP/7.10]), it is considered appropriate to adjust the significance of effect to moderate adverse for very high sensitivity soil.

Decommissioning

The ES states:-
11.7.19. With respect to soil, there is potential for erosion associated with works conducted on steep slopes located within the Order Limits. The number of vehicle movements is anticipated to be less than during the construction phase, limiting the potential for compaction of soil to occur.

Decommissioning works are also less likely than construction works to adversely impact on agricultural field drains as there would be no requirement for piling, so this phase is less likely to result in deterioration of soil quality.

11.7.23. Following decommissioning, it is intended that the land would be returned to the landowner(s) for agricultural use. However, for the purposes of this assessment, it has been assumed that Green Infrastructure (excluding Field Tb2 and the community growing area) will be permanent. The permanent land take for Green Infrastructure affects a total area of 166.2ha, of which 77ha are classified as BMV land.

11.7.24. Further detail on the decommissioning phase is detailed in ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1].

The reality often is that contractors are under immense pressure to complete works in accordance with a work programme and will inevitably undertake works in substandard conditions in order to complete their contractual obligations.

Suitable soil management and restoration clauses would be needed in order to secure the land's quality at the end of the term. Whilst many of the damaging operations can be remedied using agricultural equipment, the layout of the panels and buried cables will often prohibit this during the life of the solar farm and as such remedies can only be completed at the end of the term when all infrastructure has been removed. If the soil is in substandard condition during the operation of the solar farm, carbon sequestration is reduced and infiltration of water can also be reduced, leading to localised standing water and the reduction in soil quality.

There is a programme for decommissioning and re-instatement of the land. Whilst this is detailed and can be conditioned as part of a consent, even possibly with S106, it remains to be seen whether it will be effective in leading to the land being returned to productive agriculture.

11.9.20. As in the earlier phases, where vehicle movements are required over soils for decommissioning activities, these will be managed by the oSMP [EN010149/APP/7.11] to prevent damage to soil structure, as well as potential damage to field drains (and subsequent effects on drainage of agricultural land). This will control the timing of work and take into account soil saturation. Although the decommissioning phase will not adversely affect soils if the oSMP [EN010149/APP/7.11] is followed, as above, it is worth noting that a reduction in soil quality can be reversed, preventing medium or long-term effects.

Cable route

It has been agreed that the cable route involves temporary disturbance of the soils to enable a trench to be dug and the cabling to be inserted. This will not involve the sealing or downgrading of the land quality. An ALC survey of the cable route has been carried out, and the Outline Soil Management Plan (oSMP) includes the details.

The route of the offsite Grid Connection Route Corridor has been ALC surveyed. The cable route will be underground and laid either through open trenching or through directional drilling where open trenching is not possible.

As each section of cable is laid it will be back filled, and farming would be able to re-commence on this land.

As ever the trenching works may damage land drainage locally and a suitable record of condition and re-instatement plan is required.

Ecological Effect

There is some conflict between maintaining the land in agricultural production and improving biodiversity. Whilst not incompatible, site based issues, such as soil type(s) and local agricultural practices may create future problems. The biodiversity areas particularly target the highest grades on agricultural land and any future restriction that might prevent its return to cultivation should be a consideration in the planning process and in the conditioning of any consent.

Additional Information for Local Impact Report

Changes That Have Occurred to Scheme

The DCO red line

This has been amended to remove high grade BMV around site perimeters. This is a positive amendment.

ALC Detail Main 3 sites

The sampling across the Solar Park site has been carried out in two stages, in consultation with Natural England and NKDC. Initially a semi-detailed ALC was carried out, involving sampling on a regular 200 metre by 200 metre grid. Since that time the whole site has been fully surveyed including the cable route – to the satisfaction of NE.

BMV Land 'Take'

The overall ALC findings are found in tables in the ES chapter (**Table 11.13 Appendix 3**). Approximately 42% of the site is assessed as BMV.

BMV land is considered as temporarily used under the panels, although 40 years is a long period. The amount of BMV land to be lost 'permanently' (mainly due to green infrastructure) is significant, amounting to around 77 hectares of BMV.

The total area of BMV land – mostly Grade 3a, with the remaining non BMV being Grade 3b -moderate quality. The area of BMV has been reduced since the original DCO red line. The difference between

Grade 3a and 3b however is quite small in this instance and there is a degree of subjectivity about the difference, though I do not dispute the findings.

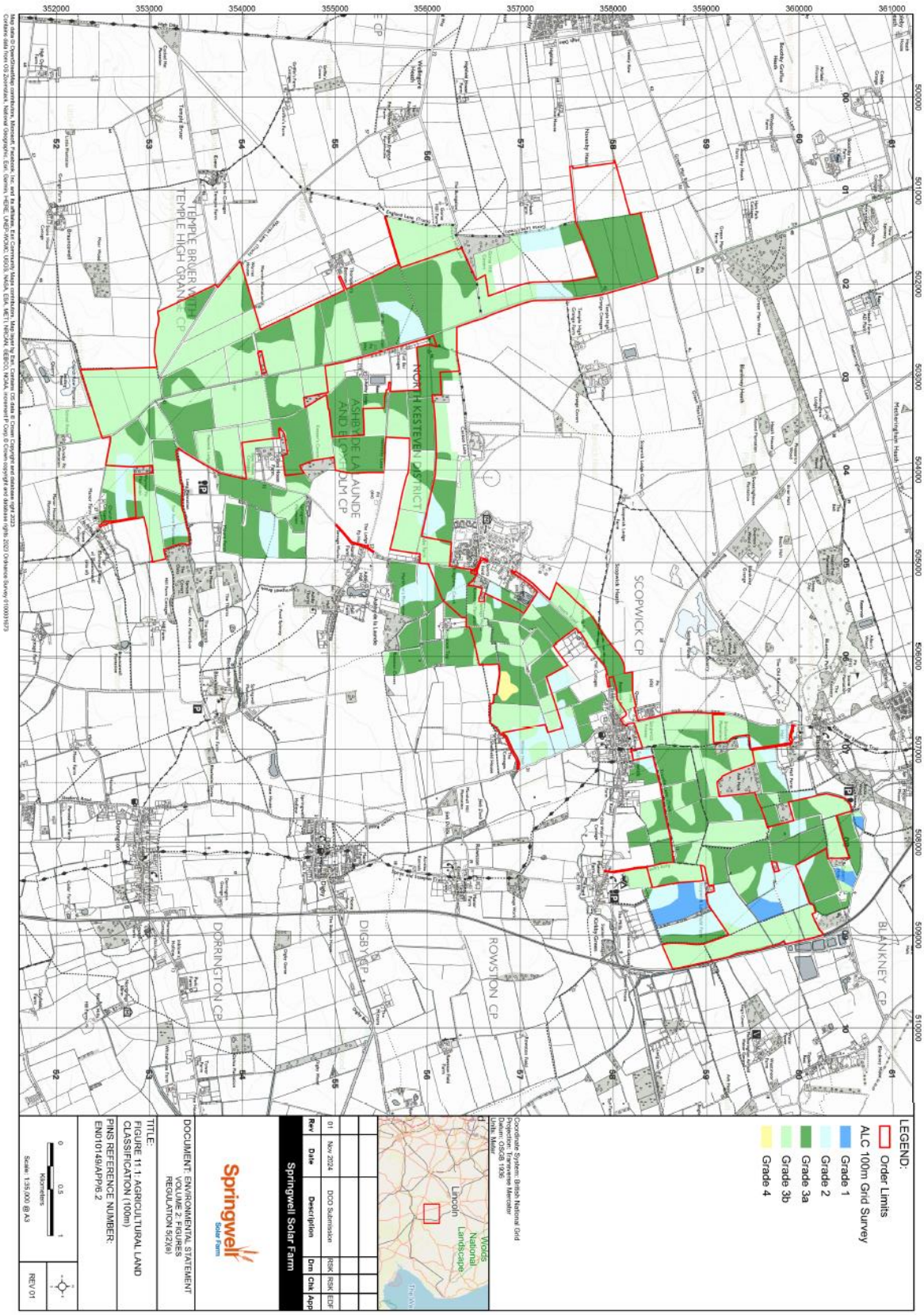
Nevertheless, the whole area is productive farmland, which will be removed from mainly arable farming for 40+ years and at best, a lower intensity grass based system will replace it. The loss of arable production is I consider locally significant and in view of other projects in the wider District and County potentially cumulatively significant.

Whilst the scheme includes measures to remove the panels at the end of the project, this will remain and uncertainty as very few largescale solar farms have been decommissioned in the UK to compare.

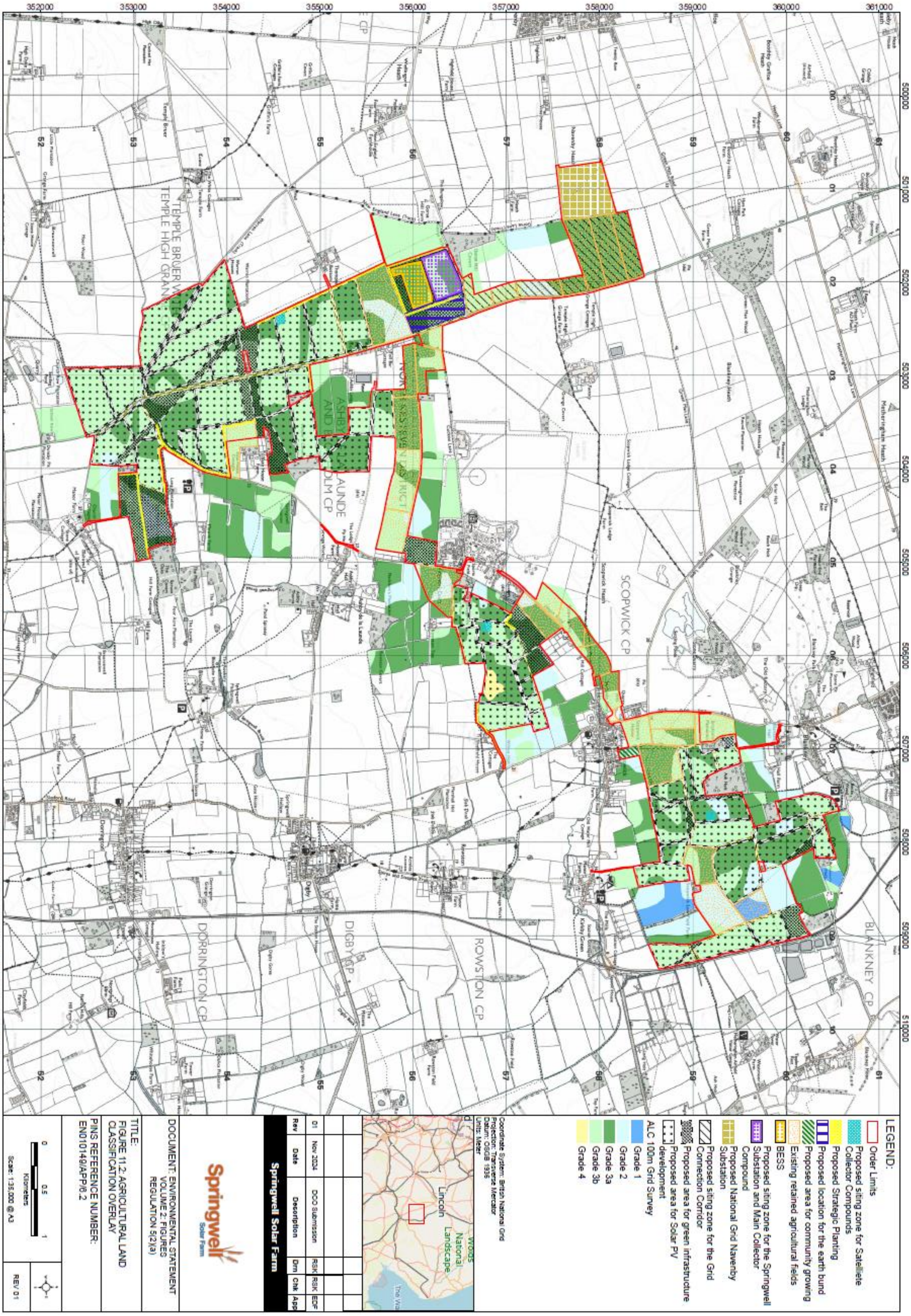
Spatial Approach and Methodology for Assessment of Significance

The report follows the recent guidelines found in the IEMA Soils and EIA document. It argues that the impact on actual loss of BMV land is therefore small. This is only correct if it is accepted that the temporary loss of around 540 hectares of BMV is not included in this assessment. I recognise that Natural England consider the main use as temporary, however local policies may take a different view.

Appendix 1


LEGEND:
Order Limits
ALC 100m Grid Survey
Grade 1
Grade 2
Grade 3a
Grade 3b
Grade 4
Springwell Solar Farm
DOCUMENT: ENVIRONMENTAL STATEMENT VOLUME 2: FIGURES REGULATION 5(2)(e)
TITLE: FIGURE 11.1: AGRICULTURAL LAND CLASSIFICATION (100m)
PINS REFERENCE NUMBER: EN010149/APP/6.2
REV 01
Rev 01 Nov 2024 DCO Submission RSK RSK EDF

Appendix 2


LEGEND:
Order Limits
Proposed siting zone for Satellite Collector Compounds
Proposed Strategic Planting
Proposed location for the earth bund
Proposed area for community growing
Existing retained agricultural fields
BESS
Proposed siting zone for the Springwell Substation and Main Collector Compound
Proposed National Grid Navenby Substation
Proposed siting zone for the Grid Connection Corridor
Proposed area for green infrastructure development
Proposed area for Solar PV
ALC 100m Grid Survey
Grade 1
Grade 2
Grade 3a
Grade 3b
Grade 4
Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter
Springwell Solar Farm
D1 Nov 2024 DCO Submission RSK RSK EDF
Rev Date Description Drn Chk App
DOCUMENT: ENVIRONMENTAL STATEMENT VOLUME 2: FIGURES REGULATION 5(2)(a)
TITLE: FIGURE 11.2: AGRICULTURAL LAND CLASSIFICATION OVERLAY
PINS REFERENCE NUMBER: EN010149/APP/6.2
Scale: 1:35,000 @ A3
REV D1
SCOPWICK CP
ROWSTON CP
DIGBY CP
DORRINGTON CP
BLANKNEY CP
TEMPLE BRUER W
TEMPLE HIGH GRAN

Appendix 3

Table 11.12 Agricultural Land Classification survey results of the key components of the areas surveyed within the Order Limits

Grade/ subgrade category	Temporary land use										Permenant land use	
	Satellite Collector Compounds		Springwell Substation and Main Collector Compound		BESS		Solar PV development		Green Infrastructure (Field Tb2 and community growing area)		Green Infrastructure	
	Area (ha)	Area (%)	Area (ha)	Area (%)	Area (%)	Area (%)	Area (ha)	Area (%)	Area (ha)	Area (%)	Area (ha)	Area (%)
Grade 1	-	-	-	-	-	-	-	-	-	-	-	-
Grade 2	-	-	-	-	-	-	14.3	2.4	1.9	3.6	11.8	7.1
Subgrade 3a	1.5	50.0	6.9	44.2	12.6	93.3	196.4	33.2	29.8	57.3	65.3	39.3
Subgrade 3b	1.5	50.0	8.6	55.8	0.9	6.7	376.4	63.7	20.4	39.1	89.1	53.6
Grade 4	-	-	-	-	-	-	4.2	0.7	-	-	-	-
Grade 5	-	-	-	-	-	-	-	-	-	-	-	-
Non-agricultural	-	-	-	-	-	-	-	-	-	-	-	-
Urban	-	-	-	-	-	-	-	-	-	-	-	-
Total BMV	1.5	50.0	6.9	44.2	12.6	93.3	210.7	35.6	31.7	60.9	77.1	46.4
Total non-BMV	1.5	50.0	8.6	55.8	0.9	6.7	380.6	64.4	20.4	39.1	89.1	53.6
Total	3.0		15.5		13.5		591.3		52.1		166.2	

Appendix D

The following non-designated heritage assets (historic farmsteads) have been identified as potentially sensitive to change:

- Ashby Lodge (MLI120940): Located within a historic cluster; its proximity to other affected farmsteads (Slate House MLI120942, Thompson's Bottom Farm MLI86675) highlights the need for setting-based contextual analysis.

- Slate House (MLI120942): Enveloped by proposed development; the lack of setting assessment risks underrepresenting the asset's contribution to local rural character.

- Glebe Farm (MLI120941): Lies within the historic visual and spatial sphere of Ashby Hall, with adjacent land described as "proposed area for mitigation, enhancement and/or retained agricultural land" but with no secured long-term use. Retaining this land in agricultural use would be the most appropriate outcome to protect the asset's significance.

- Rowston Top / The Maltings (MLI120856): Enveloped by proposed development with adjacent land described as "proposed area for mitigation, enhancement and/or retained agricultural land," but with no secured long-term use. Retaining this land in agricultural use would be the most appropriate outcome to protect the asset's significance, including its potential association with Ashby Hall estate.

- Scopwick Lowfield Farm (MLI120841): Subject to significant encroachment. While some open views remain, they are insufficient to offset the overall impact on the farmstead's setting.

- Sheffield House (MLI120857): Lies immediately south of proposed solar development, with partial screening from mature vegetation. Despite this, its proximity and rural context warrant further assessment to understand the impact on its setting and significance.

Note: The collective value and setting significance of these farmsteads is supported by the *Greater Lincolnshire Farmsteads Character Statement* (Historic England, 2015), which recognises that traditional farmsteads are integral to the rural character of Lincolnshire. Their form, setting and interrelationship with the landscape reflect the historic development of agricultural practices and settlement patterns. The Statement highlights that these farmsteads often form cohesive historic groups, contribute to landscape legibility, and hold significance beyond their individual components, especially where they retain their traditional layout and relationship to field systems and rural routeways.