

**Nationally Significant Infrastructure Project: EN010149
Springwell Solar Farm**

**Response to The Examining Authority's written questions and requests for
information (ExQ1) issued on 13th May 2025**

Prepared by Lincolnshire County Council (LCC)

June 2025

The following table sets out the Council's response to the Examining Authority's (ExA's) written questions (ExQ1) where a response from the County Council was sought.

ExQ1	Question	LCC Response
1.	Climate Change	
1.5.1	<p>Assessment Methodology</p> <p>Are NKDC and LCC content with the methodology used in the climate change assessment in the ES [APP-048] and the assumptions used in ES Appendix 8.1: Raw Data and Emissions Factors [APP-096]?</p>	<p>It is noted that previous stakeholder engagement has been with North Kesteven District Council (NKDC) Climate Change Manager (table 8.1 of APP-48) and LCC would defer to NKDC on the acceptability of the methodology used.</p> <p>However, the ExA's attention is drawn to LCC's comments in paragraph 18.27 of our Local Impact Report (LIR), where concerns are raised in respect of replacement of solar PV's, as follows:</p> <p><i>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</i></p>

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		<p><i>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.</i></p> <p>It is also noted that in Table 5 general Assumptions of APP-096, the following assumptions made:</p> <ul style="list-style-type: none"> • Landfill disposal distance 100km - RSK Assumption based on distance to specialist disposal facilities • Recycling disposal distance 100km - RSK Assumption based on distance to specialist disposal facilities <p>LCC in its LIR chapter 18 (paragraphs 18.21 to 18.30) has set out concerns regarding the availability of suitable facilities for the recycling of solar waste, particularly cumulatively. Further information on the facilities the applicant considered to be available in 100km's would therefore be welcomed.</p>
1.5.2	<p>Baseline for Assessment Comparisons</p> <p>In the decision letter for Gate Burton Energy Park (July 2024), the Secretary of State commented that it considered a Combined Cycle Gas Turbine power plant an inappropriate baseline for assessment comparisons</p>	<p>b) LCC are aware of a number of other NSIP Solar development's that have also used CCGT as a comparison baseline but note the SoS conclusions for Gate Burton Energy Park and the West Burton Solar Project, that comparison to a counterfactual CCGT facility is an inappropriate baseline for assessment comparisons. Other potential options might include grid mix comparison, other types of renewable energy or existing land use as a baseline.</p>

ExQ1	Question	LCC Response
	<p>a. Applicant, provide further justification for this assumption in light of the SoS' view.</p> <p>b. What comparison should be used instead?</p>	
7. Cultural Heritage		
1.7.1	<p>Requirement 11 - Archaeology</p> <p>HE state in its RR [RR-159] that there needs to be a mechanism whereby the results of additional assessment stage trial trenching undertaken post-DCO have a material bearing upon the subsequent phase of the archaeological mitigation scheme. The Examining Authority (ExA) note in paragraph 4.1.7 of the Outline Written Scheme of Investigation (oWSI) [APP-0148] that Task specific WSIs would be prepared in consultation with the Local Planning Authority's (LPA) archaeological advisor prior to the carrying out of any archaeological trenching or investigation.</p> <p>a. Applicant, explain with reference to the wording of R11 and R5 how the LPA will be involved in determining the scope for any subsequent archaeological work and additional mitigation</p>	<p>c) Please refer to paragraphs 14.43 to 14.46 in LCC's LIR for comments on requirement 11 and to the table on the draft DCO from p. 67 of the LIR where alternative wording is proposed.</p>

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	<p>measures in the detailed design, as a result of the above archaeological trenching or investigation?</p> <p>b. Should R11(1) include that any approval by the relevant planning authority (LCC) be in consultation with HE and NKDC?</p> <p>c. LCC, NKDC and HE, provide your comments on the proposed drafting of this requirement including any additional/ revised drafting as appropriate with accompanying justification.</p>	
1.7.2	<p>Above Ground Heritage Assets</p> <p>NKDC [RR-305] and LCC [RR-233] raised concern that there is a lack of detailed analysis of built heritage assets. The Applicant submitted revised documents [AS-001, AS-012, AS-013, AS-014, AS-015, AS-018 and AS-019] in response to Section (s) 51 advice issued by the Planning Inspectorate [PD-002].</p> <p>a. LCC and NKDC, for those heritage assets that have been scoped into the assessment, do you agree with the results of the Applicant's assessment?</p> <p>b. LCC and NKDC, can you provide a list within your Local Impact Report (LIR) of built heritage assets that have not been scoped into the assessment which you consider should be scoped in with accompanying justification?</p>	<p>a) LCC agree and have no further comments to make regarding assets scoped into the assessment at this time.</p> <p>b) This has been provided in LCC's LIR.</p>

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	<p>c. Applicant, provide justification for the scoping out of the specific farmhouses referenced in the NKDC RR as follows:</p> <p>Thompsons Bottom Farmhouse and outbuildings (LBEN 1254329/1254407)</p> <ul style="list-style-type: none"> • Temple Farmhouse (LBEN 1254328 and 1261359) • Home Farmhouse (LBEN 1061825) • Farmyard to the north of The Firs (LBEN 1280661) 	
9.	Land, Soils and Groundwater	
1.9.2	<p>Agricultural Land Classification Surveys</p> <p>The Applicant has undertaken Agricultural Land Classification (ALC) Surveys of the application site [APP-112 to APP-114]. NE [RR-291] has noted that the ES [APP-051, Table 11.12] presents a breakdown of land use across the Order limits, but does not specifically categorise any construction compounds or access tracks.</p> <p>a. Applicant, confirm if construction compounds and access tracks have been taken into account in Table 11.12 and if so, where.</p> <p>b. Are LCC and NKDC content that the ALC surveys have been undertaken robustly?</p>	<p>The results in the ALC reports have been undertaken by a professional team in agreement with Natural England and the results are considered reliable.</p>

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1.9.5	<p>Cumulative Effects on Best and Most Versatile Agricultural Land</p> <p>The Applicant has set out [APP-056, Paragraph 16.8.9.] that it estimates the total area of BMV land within Lincolnshire to be over 410,000ha. Therefore, the Proposed Development would alone occupy some 0.13% of the BMV land in Lincolnshire and with the development of all the solar farms identified in the cumulative assessment [APP-056, Table 16.1] alongside the Proposed Development, approximately 2% of the county BMV land resource will be temporarily used. Do LCC and NKDC agree with the Applicant's figures?</p>	<p>LCC agree with the calculation of 410,000ha BMV in Lincolnshire, but have concerns over the cumulative BMV calculation. The Zone of Influence (ZoI) as identified in paragraph 16.8.3 [APP-056] includes the county of Lincolnshire and in addition, solar developments within 1km of the border with Nottinghamshire. Table 16.12 [APP-056] therefore includes NSIP solar farms which are outside Lincolnshire. The cumulative BMV of 2% has been calculated as a percentage of Lincolnshire's BMV. Whilst the calculation is numerically correct, LCC would like to point out that the inclusion of Nottinghamshire solar farms in the calculation skews the results. Additionally, a number of NSIPs have emerged and/or have progressed further and updated BMV figures are available. There are however omissions from Table 16.12 as Leoda Solar NSIP is not included and only 2 Town and County Planning Act (TCPA) Solar Farms are listed in the calculation.</p> <p>Using data from the Renewable Energy Planning Database: quarterly extract¹ for Lincolnshire, which has been updated to include information up to 22 May 2025, TCPA ground mounted solar farms of 1MW and 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, updating the NSIP BMV information and including the TCPA BMV provides a</p>

¹ [Renewable Energy Planning Database: quarterly extract - GOV.UK](#)

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		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.
1.9.6	<p>Soil Management and Mitigation</p> <p>The oCEMP, oOEMP, oDEMP and Outline Soil Management Plan (oSMP) contain a range of measures to manage and mitigate potential effects on soil. NE [RR-291] has raised several concerns with regard to the contents of the oSMP, with regard to soil handling and soil reinstatement.</p> <p>a. Applicant, provide further justification for the need to handle soils in the wetter winter period, and/ or provide further information to illustrate that every effort will be taken to avoid the need to handle soils in a plastic condition.</p> <p>b. Applicant, should the oSMP include a clear commitment to restoring the original ALC grade of all restored agricultural land?</p> <p>c. Applicant, clarify why removal of hardstanding is specifically limited to a 1 metre depth.</p>	LCC are broadly in agreement with these documents in respect of soil management and mitigation, subject to the final documents being subject to approval through a respective requirement in the DCO.

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	<p>d. Applicant, explain why reference is made within the ES [APP-051, Paragraphs 11.7.22 and 11.8.24] to the importation of topsoil during restoration and why this could be necessary.</p> <p>e. Are LCC and NKDC content with the measures set out in all of the above management plans?</p>	
1.9.7	<p>Contamination</p> <p>The ES [APP-051, Paragraph 11.8.1.] sets out that an interpretive report is required relating to site investigation work that has already been completed prior to construction works commencing and will be issued to LCC. This will provide further information relating to potential pollutant linkages that were identified in the Preliminary Risk Assessment [APP-115 to APP-118]. In addition, the Preliminary Risk Assessment makes several recommendations, such as shallow intrusive works to determine ground and groundwater conditions, gas monitoring and boreholes.</p> <p>a. Is it appropriate to prepare the interpretive report post consent?</p> <p>b. Applicant, how are the recommendations in the Preliminary Risk Assessment being addressed?</p>	LCC would defer to NKDC (Environmental Protection) as the relevant authority for ground contamination matters.

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1.9.11	<p>Unexploded Ordnance</p> <p>The ES [APP-051, Table 11.3] sets out that the risk of Unexploded Ordnance (UXO) will be managed by the implementation of a UXO Risk Management Plan for intrusive works.</p> <p>a. Is it appropriate to prepare the risk management plan post consent?</p> <p>b. Is the requirement for a risk management plan suitably secured in the dDCO?</p>	<p>LCC do not hold in-house expertise regarding unexploded ordnance. This would be a matter which we would refer to the Defence Infrastructure Organisation or the Emergency Services.</p>
10.	Landscape and Visual Impact	
1.10.2	<p>Residents and Visitors of Surrounding Villages</p> <p>Are LCC and NKDC satisfied with the Applicant's justification set out in Table 10.2 and Section 10.5 of ES Chapter 10 [APP-050] for not undertaking a full assessment of visual impacts for:</p> <p>a. Residents and visitors to the villages of Scopwick, Kirkby Green, Blankney and Ashby de la Launde; and</p> <p>b. Residents of the barracks at RAF Digby</p>	<p>A concern was identified at the scoping stage that receptors in these villages/settlements 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.</p> <p>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 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.</p>

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		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.
1.10.3	<p>Wider Landscape Character</p> <p>Numerous IPs [including RR-306] raise concern regarding the extent of solar development within the wider Lincolnshire area and the impact this would have on the character of the landscape. However, the ES [APP-050] assessed that significant effects in construction, operation and decommissioning would be limited to tightly defined tracts of Landscape Character Area (LCA) 7 and LCA11.</p> <ol style="list-style-type: none"> Applicant, explain why the wider landscape character at the regional or county scale would not be adversely affected by the Proposed Development alone. When considered cumulatively with other solar developments (both above and below the threshold for NSIP development), does the extent of solar development affect the key characteristics of the Central Plateau Landscape Character Type (LCT) or National Character Area (NCA) 47 - Southern Lincolnshire Edge? 	<p>LCC have concerns regarding effects on the national, county and regional landscape character areas.</p> <p>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. However repeated views and presence of large scale solar would combine over time to create a greater perception of change.</p> <p>To calibrate this 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.</p>

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	c. Applicant , in a similar format to Figure 16.8 [APP-072], provide a plan that shows the Order limits and other solar developments in relation to the boundary of LCA7, LCA11, the Central Plateau LCT and NCA47?	
1.10.4	<p>Character of Surrounding Villages</p> <p>Do LCC and NKDC agree with the Applicant's position in ES chapter 10 [APP-050] that the changes to the Landscape Character Area (LCA) 7 and LCA11 surrounding Blankney, Scopwick, Kirkby Green, Ashby de la Launde and RAF Digby will not affect the character of these villages? If not, provide an explanation of how the character of these villages would be affected.</p>	<p>Development has been offset from these villages, and therefore we would not expect there to be any direct landscape effects. Limited intervisibility has been identified between the development and these villages/settlements, and therefore the perception of solar development from within is likely to also be limited. However, we do have concerns regarding indirect effects to these villages through a change to the context and setting through introducing large scale solar to the surrounding landscape. These are characterised as rural settlements, and therefore we would judge that some of the village character is defined through their context and setting in a rural landscape, and this would be eroded through being set within a landscape containing more urbanised elements such as solar and associated infrastructure. Perception of development from the surrounding landscape is likely to come from views along roads and footpaths in the surrounding area, as well as a change in land use.</p>
12.	Population	
1.12.3	<p>Stepping Out Network and Effects on Tourism</p> <p>ES Chapter 13 [APP-053] acknowledges that significant visual effects from PRoW and the Stepping Out Network may adversely impact the</p>	<p>a) LCC do not agree with the applicant's conclusion that there would be no significant effect on tourism, please see paragraph 15.7 of LCC's LIR. Paragraph 13.7.26 of APP-053 is dismissive of the impacts on tourism and is superficial in that assessment.</p>

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	<p>number of visitors to the area in the operational phase. However, the Applicant's position [APP-053, Paragraph 13.7.26] is that as other routes of the network may continue to be used, the residual impacts associated with loss of visitors such as the potential loss of business will not likely be impacted.</p> <p>a) Do you agree with the Applicant's conclusion of no significant effect on tourism related to the stepping out walks considering there are moderate/ major adverse visual effects for footpath users identified in ES chapter 10 [APP-050]?</p> <p>b) Is any evidence available that quantifies how regularly the PRoW and the Stepping Out Network within and adjacent to the Order limits are used?</p>	<p>b) LCC do not have any reliable data on PRoW use. The Stepping Out walks are/were a District Council promoted route scheme. NKDC may therefore hold information but LCC do not.</p>
13.	Traffic and Transport, inc Public Rights of Way	
1.13.3	<p>A15/ B1202 Junction Improvement</p> <p>The Transport Assessment (TA) [APP-123] identifies capacity issues at this junction, but notes that LCC are proposing their own improvement works due to existing issues. LCC has set out [RR-233] that it considers the Proposed Development</p>	<p>LCC does not consider the bus commuter services to be a realistic alternative. An alternative proposal has been agreed with the Applicant whereby LGV traffic associated with the development would be routed to avoid this junction during the am and pm 2 peak hour periods.</p>

ExQ1	Question	LCC Response
	<p>should make a financial contribution to the improvements works. In addition, in the absence of the delivery of the improvement works, the Applicant has proposed a commuter bus alternative [APP-054, Paragraph 14.9.6].</p> <ol style="list-style-type: none"> Provide an update on the delivery of the potential junction improvement works, including anticipated timescales. Applicant, what is your response to the request from LCC to contribute towards the cost of the improvement works? LCC, are you content that in the absence of any improvement works, the proposed commuter bus is a realistic alternative? 	
1.13.4	<p>North Hykeham Relief Road</p> <p>The TA [APP-123, Paragraph 10.1.29] identifies that the North Hykeham Relief Road scheme is expected to be completed in 2028. On this basis, the Applicant considers that it is likely that the baseline levels of traffic predicted for 2028 will not materialise, thus the operation of the A15/ B1202 Junction should improve, and the overall impacts of development traffic lessened.</p> <ol style="list-style-type: none"> Provide an update on the delivery of the proposed relief road. 	<p>The NHRR is scheduled to start construction in 2025 and be completed by 2028.</p> <p>It is agreed that baseline flows would be reduced if the NHRR is delivered. However, as the NHRR may be delayed other mitigation is required at this junction as proposed in answer to Q 1.13.3</p>

ExQ1	Question	LCC Response
	b. LCC , do you agree with the Applicant's view?	
1.13.5	<p>Abnormal Indivisible Loads Route</p> <p>The oCTMP [APP-0141, Appendix 3] sets out the route that Abnormal Indivisible Loads (AILs) would follow to the application site. NR [RR-296] wishes to ensure that AIL movements under or near the Bridges are undertaken safely at all times and has set out that its engineers will be considering the details in the oCTMP.</p> <ul style="list-style-type: none"> a. NH and LCC, is the proposed route considered to be acceptable? b. NR, provide an update on your consideration of the oCTMP. c. Applicant, set out how any AIL movements will safeguard any bridges along the route 	Yes, the AIL route is acceptable.
1.13.6	<p>Outline Travel Plan</p> <p>The measures proposed by the Applicant to promote sustainable modes of transport are set out in the oCTMP [APP-0141, Appendix 1]. Does the Outline Travel Plan go far enough and should it include mode share targets?</p>	Targets are not necessary.

ExQ1	Question	LCC Response
1.13.7	<p>Construction Traffic Routes</p> <p>Concern about construction traffic travelling through local villages has been raised by numerous interested parties [too many to list]. The routes proposed to be used by construction traffic are identified in the ES [APP-070, Figure 14.4] and in the oCTMP [APP-0141]. To ensure that effects do not arise that have not been assessed in the ES, should these routes be secured in a requirement within the dDCO?</p>	<p>Construction traffic needs to be restricted to the proposed routes in the ES. This could be enforced through a mechanism in the CTMP.</p>
1.13.8	<p>Construction Traffic Movements</p> <p>The ES [APP-054, Table 14.23] identifies anticipated construction traffic movements on each assessed link. To ensure that effects do not arise that have not been assessed in the ES, should these figures be secured in a requirement within the dDCO?</p>	<p>As above, the assumptions which underpin the ES need to be enforceable through a mechanism in the CTMP.</p>
1.13.9	<p>Public Rights of Way Improvements</p> <p>LCC [RR-233] wish to see: a new PRow linking ROWS/5/1 to the highway on the western end; an enhancement to fix the gap between the legal line of Ashby De La Launde PF11 to the highway; the continuation of Cuckoo Lane; and that the surfacing for the proposed upgrade to the existing PRow between Scopwick and Blankney to</p>	<p>Following further discussion between LCC and applicant, LCC are no longer seeking the ROWS/5/1 to the highway link and the continuation of Cuckoo Lane. The enhancement to fix the gap between the legal line of Ashby De La Launde PF11 to the highway is agreed as an enhancement to the network for public benefit. Please see further details in the Statement of Common Ground Ref. 12.5.</p>

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	<p>bridleway status to be defined to ensure that it is accessible all year round.</p> <ol style="list-style-type: none"> Applicant, what is your response to these requests? LCC, provide further evidence to justify the need for such improvements and why they are necessary to make the development acceptable. 	
1.13.10	<p>Outline Public Rights of Way and Permissive Paths Management Plan</p> <p>The Outline Public Rights of Way and Permissive Paths Management Plan (oPRoWPPMP) [APP-0145] contains the Applicant's approach to managing the PRoWs and Permissive Paths to ensure they are safe and accessible. Network Rail [RR-296] has set out that the oPRoWPPMP proposes changes to a public right of way that includes a railway crossing (the Scopwick Yard Level Crossing which connects Scop/8/2 and M/tin/7/1) and that it does not appear that the impacts on the railway or on continuing use of the public rights of way using the level crossing in this location have been considered. It notes that the oPRoWPPMP sets out various alternative routes for Scop/8/2 but these do not facilitate access across the railway to connect with the existing</p>	<p>The details set out in the oPRoWPPMP, subject to the points set out in Appendix B of LCC's LIR being addressed and the requirement to submit a full PRoWPPMP for approval as a requirement in the DCO.</p>

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	<p>path on the other side and would therefore render the level crossing obsolete while any diversions are in place.</p> <ul style="list-style-type: none"> a. LCC, are you content with the details set out in the oPRoWPPMP? b. Applicant, how will access to the level crossing be maintained? 	