

Application by Springwell Energy farm Limited for an Order Granting Development Consent for the Springwell Solar Farm

Summary of submissions on behalf of Lincolnshire County Council

ISH1 7 May 2025

1. Under **Agenda Item 3** Lincolnshire County Council (“LCC”) made the following points:
2. In relation to Alternatives and Site Selection, LCC noted the applicants comments and that more detail will be provided. LCC will provide any further comments through its written submissions in due course, as necessary.
3. Under **Agenda Item 4** LCC made the following points:
4. In relation to Grid Connection, LCC were satisfied that its points had been covered thoroughly by North Kesteven District Council, and LCC supported those comments.
5. Under **Agenda Item 5** LCC made the following points:
6. In relation to Cumulative Effects, LCC welcomed the applicants commitment to produce an interrelationship report which will aid understanding of the relationship between multiple NSIP’s and other large scale energy projects that are proposed in this part of Lincolnshire.
7. LCC also stated that in addition to the interrelationship report that had been produced for the cluster of solar schemes around Gainsborough, a similar report had been produced by the Outer Dowsing Offshore Wind Scheme, which is considering many schemes in the Eastern part of Lincolnshire including long linear schemes and other schemes such as Lincolnshire Reservoir.
8. LCC further commented that such reports have benefits in helping to understand the interrelationships around timings and construction, phasing and how the order limits of the projects relate to each other. This is especially useful for the local communities that are affected, to visualise the impacts of these schemes together. Interrelationship reports can also promote collaborative working between the developers, which can have benefits such as shared mitigation and enhancements, which have the potential to be delivered collectively.

9. The Examining Authority asked LCC to confirm whether we are content with the approach the ES has taken to cumulative effects, to which LCC stated further comments on will be provided in LCC's Local Impact Report. However, at a high level LCC acknowledged that the applicant has provided a cumulative assessment based on information available to date and will be updating the assessment to include the Leoda scheme. LCC recognised the approach has been taken in line with the Planning Inspectorate's advice, and welcomed the specific chapter within the ES on cumulative effects.
10. LCC highlighted the fact the Lincolnshire is seeing an unprecedented number of NSIP's which is significant concern to the Council and that the cumulative impact assessment should be kept under regular review whilst the Springwell Scheme is going through its DCO process, particularly as some schemes are being progressed at a significant pace.
11. LCC noted that the cumulative assessment with respect to the Navenby substation in the ES is a high-level appraisal and is based on assumptions and information on similar developments. LCC highlighted that the grid connection is an essential part of the development to enable Springwell to go ahead and questioned whether at this stage there is enough information available on the Navenby substation for a robust assessment of the inter project effects of these developments. LCC drew the ExA's attention to paragraph 4.11.9 of NPS EN-1, which relates to situations where separate applications are to be made for grid connection infrastructure. If the applicant pursues that option, there are implicit risks of doing so and they must provide sufficient information to comply with the EIA regulations, including on the cumulative effects with grid connections.
12. Under **Agenda Item 6** LCC made no verbal comments.
13. Under **Agenda Item 7** LCC made the following points:
14. In relation to cumulative transport effects, LCC advised that the traffic numbers submitted so far are acceptable. They do not include the Navenby sub-station but that is not yet a committed development and the information isn't currently available. It will be considered by LCC when it is submitted.
15. To further questions from the ExA, LCC suggested that potentially this could lead to the substation not being built at the same time as the Solar Farm if the traffic numbers were to be too great and it would need to be delayed until after the solar farm. The sub-station will be assessed by LCC when it is submitted to NKDC and LCC in their response will propose suitable conditions to ensure that the cumulative traffic of the sub-station (with other committed schemes) is acceptable.

16. In respect of highways improvements, LCC confirmed that the 2 junction improvements on the A15:

- Gorse Lane/A15
- B1191/A15

will require a legal agreement with LCC for the technical checking, approval and inspection. A bond will also be required to cover the cost of the works in case a developer stops and LCC has to step in and make the highway safe by completing the works. The traffic risk at these 2 junctions is high due to the nature of the roads and the volume of traffic.

17. Other improvements proposed in the DCO, such as passing places and accesses do not require a legal agreement or bond, but the technical checks can be completed via later submissions under the Construction Traffic Management Plan (CTMP). These other roads are less busy and the type of improvements less risky, LCC would classify them as Minor Works.

18. In response to the ExA questions about level of detail on submitted drawings. The level of details for the access junctions should be improved to show details of visibility splays and swept paths. The indicative nature of the drawings also means that the amount of hedgerow to be removed isn't determined at this stage, which could have an ecological impact.

19. Under **Agenda Item 8** LCC made no verbal comments.

20. Under **Agenda Item 9** LCC made the following points:

21. The Examining Authority recognised that LCC raised concerns within its relevant representation submission that the amount of trial trenching undertaken to date has not been sufficient. LCC confirmed we are the leading authority on archaeology matters. LCC were then asked by the Examining Authority to explain why we believe there is a need for additional trial trenching, including whether that would be a blanket spread or if there are particular areas that we would like to see targeted trial trenching. LCC confirmed that site specific and targeted trial trenching would be the preferred approach and are currently waiting on further information on locations of ground impacts from the Applicant at detailed design stage. Once these have been received, LCC can work with the Applicant's archaeological consultant to assess the location of impacts and calculate a proportionate and targeting programme of archaeological evaluation trenching. This would include 'on the ground impacts' such as landscaping, bunds, attenuation tanks, drainage and potential ecological mitigation areas which can be used to create a final archaeological mitigation strategy and management plan. This will need to be agreed before the commencement of groundworks, which will reduce

the impact of unexpected archaeology, also reducing budgeting and scheduling implications for the applicant.

22. LCC were asked if we were able to provide details of where we would like to see targeted areas of investigation. LCC agreed with the Examining Authority that further information from the Applicant is required before we would be able to comment further on this matter.
23. LCC also confirmed that the Applicant's trial trenching that has been undertaken to date is in line with emerging best practice within the areas it has been completed, which are the major fixed infrastructure areas.
24. LCC confirmed that we disagree with the wording of requirement 11 as proposed by the Applicant. LCC would prefer to see the wording of the Mallard Pass requirement, with minor amendments to include an archaeological mitigation strategy and management plan, included, as LCC feel that this wording is clear, concise, robust and proven effective. LCC do not agree with the revised wording as works would have significant ground impacts and omits works packages 7-8, which have the potential for substantial ground disturbance on areas currently unevaluated. We do agree in terms of the evaluation phase and the results informing the final investigation but would recommend the following wording is used to secure the additional archaeological works:

11.—(1) The authorised development may not commence until:
(a) a scheme for additional trial trenching has been submitted to and approved by 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 an archaeological mitigation strategy and management plan 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 archaeological mitigation strategy and management plan approved under sub-paragraph 1(c).
25. LCC confirmed that it is broadly aligned with the position of North Kesteven District Council in relation to built heritage matters, as presented orally by their representative, Mathew Bentley.
26. LCC noted agreement with the key points raised by Historic England concerning the adequacy of the applicant's desk-based assessment (DBA) and the need for further work in respect of non-designated heritage assets.

27. LCC indicated that any concerns it may have in relation to built heritage, including non-designated heritage assets, will be set out in full in its forthcoming Local Impact Report (LIR), to be submitted at Deadline 1.
28. Under **Agenda Item 10** LCC made the following points:
29. LCC are content with the applicants LVIA methodology, and we judge this has been implemented correctly through the LVIA chapter. 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.
30. We also note that the successful establishment of any planting is very much dependent upon the implementation of an appropriate management regime, that will be laid out in the Landscape and Ecological Management Plan. As the reduction in residual landscape and visual effects is also dependent upon this plant establishment, we judge that any management should cover an appropriate period that would be for at least that of the residual effects period (ten to fifteen years), and there may be a case that the management plan associated with the DCO be implemented over the lifespan of the project.
31. We judge that the study area used within the LVIA is appropriate and a reasonable justification for these limits has been provided within the LVIA chapter.
32. LCC are content with the 40 viewpoint locations and 12 visualisations that have been included within the LVIA. These were discussed and agreed with the applicant at the pre-application stage, and those that were agreed have been carried through into the LVIA. However, we would note that, as verified in a recent Landscape Institute Technical Guidance Note LITGN-2024-01, the assessment must be on visual receptors (people who can potentially see the scheme), and Viewpoints are there only to illustrate the visual effects. The assessment is not on viewpoints.
33. Under **Agenda Item 11** LCC made the following points:
34. LCC acknowledged action point 13, for LCC to provide further commentary on potential effects on non-designated heritage assets in its Local Impact Report, for deadline 1.