

## Springwell Solar Farm – Written Submission of Oral case to ISH1 from North Kesteven District Council (ID 20054501)

Agenda Item	Comments
Item 1 – Welcome	n/a
Item 2 – Purpose of the ISH	n/a
Item 3 – Alternatives and Site Selection	n/a
<b>Item 4 – Grid Connection</b>  The Applicant, National Grid and the Local Authorities will be asked questions about the delivery of the proposed Navenby Substation, its implications for the Proposed Development and its supporting assessments, and whether it should be included in the Order limits.	<p><b>Submissions made by Shemuel Sheik of Counsel on behalf of NKDC</b></p> <p>Construction timetable relied upon in the ES Chapters is based on timetable to achieve the construction of the National Grid Navenby Substation (NGNS). That supposes that the NGNS will receive consent by early 2026. Our concerns are that the timetable is not fixed. Counsel explains that he can't comment on what the Council's position on the NGNS would be but explains that the application has not yet been made, could be refused and could be delayed by an appeal. There could be a legal challenge to any granted consent. In summary there could be delays so this project's construction timetable as it is relying on the NGNS being granted permission and proceeding without delays.</p> <p>NKDC would not want the Solar Farm construction to proceed without the certainty of a timetable for delivery of the Sub NGNS. Our main concern is that the two are built concurrently, not in isolation.</p> <p>NKDC agreed that it had concerns about the validity of the ES becoming out-of-date.</p> <p>It was not a similar scenario to that if construction takes place later due to a 3 or 5 year planning implementation condition as the applicant has premised its proposals on construction being completed by 2029. In respect of the planning balance, Applicant says it will contribute to Net</p>

	<p>Zero targets. If delayed that would impacts on weight to be attributed in addressing planning balance.</p> <p>In terms of ES Validity, the point relied on is in respect of construction period being before implementation and extent to which the ES assessments rely on that construction being borne out.</p> <p>NKDC welcomes clarification on application of paragraphs 4.11.7-8 of EN-1. NKDC understood that under para 4.11.8, where there are reasons for separate applications, there is a need for the applicant to demonstrate why there are no obvious reasons for refusal of other elements. This has not been presented to the Examination. It needs to be read in conjunction with para 4.11.7, which asks for explanation why it is not one scheme. We would welcome justification whether there has been considered as one scheme.</p> <p>NKDC consider an additional requirement is needed to secure delivery of both the solar farm and NGNS. We understand that there are commercial elements which means one would not come forward without the other, however, there should be something within the DCO securing delivery of both. NKDC wish a mechanism to ensure harms of this scheme do not come forward without benefits of electricity produced. Happy to review whatever approach is suggested by applicant. Overll, a holistic approach is needed.</p> <p>NKDC cannot comment on whether construction of the solar farm is likely if the NGNS is not consented as that is subject to the applicant's decisions and commercial reality. It does not mean that there should not be a mechanism in DCO to secure it.</p> <p>NKDC made a second point regard an additional requirement for concurrency of construction phases between the solar farm and NGNS.</p> <p>NKDC agreed that the ES does not rely on a joint construction approach but the benefits of the project rely on construction taking place together so that benefits of</p>
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	<p>energy generation can start once grid connection take place.</p> <p>NKDC will respond in writing to the ExA question via our LIR or WR as to whether a delay of 3 years would put a different weight on the benefits of the solar farm. The overall benefit of the scheme is not disputed regards the weight to be attributed to the benefits of renewable energy production, however, it is the additional benefits that could be weighed in the planning balance should a completed solar farm that is connected to the grid be achieved prior to 2030.</p> <p>NKDC confirmed that the NGNS planning application will be treated within the four corners of the application on its own merits. It may or may not be determined by the Council's Planning Committee depending on the terms of the constitution.</p>
<p><b>Item 5 - Cumulative Effects</b></p> <p>The Applicant and the Local Authorities will be asked whether the approach to the cumulative assessment is robust and has captured all relevant other developments, including Leoda Solar Farm. The Applicant will also be requested to prepare an inter-relationship report.</p>	<p><b>Submissions made by Shemuel Sheik of Counsel on behalf of NKDC</b></p> <p>NKDC confirmed that it was content with how the Cumulative Assessment was carried out and will comment further in its LIR. It recommended that the cumulative assessment is kept under review and updated following further updates.</p>
<p><b>Item 6 – Air Quality</b></p> <p>The Applicant will be asked about the implications of the PM2.5 Targets: Interim Planning Guidance. The robustness of the Battery Energy Storage System Plume Assessment will also be discussed with the</p>	<p>NKDC made no comments.</p>

Applicant and the UK Health Security Agency.	
<p><b>Item 7 – Traffic and Transport</b></p> <p>The Applicant and National Highways will be asked about the Strategic Road Network and the robustness of the Transport Assessment. Cumulative transport effects will be discussed with the Applicant and Lincolnshire County Council.</p> <p>Matters associated with the level of detail required for proposed Highway Improvements and Site Accesses will also be explored with the Applicant and Lincolnshire County Council.</p>	n/a
<p><b>Item 8 – Water</b></p> <p>The Applicant will be asked what implications the New Flood and Coastal Erosion Risk Data from the Environment Agency has for the Proposed Development.</p> <p>Matters associated with the sequential test for flood risk will be explored with the Applicant.</p>	n/a
<p><b>Item 9 – Cultural Heritage</b></p> <p>The Applicant, Local Authorities and Historic</p>	<b>Submissions made by Matt Bentley (Senior Conservation Officer) on behalf of NKDC</b>

<p>England will be asked questions relating to the extent of assessment stage archaeological trial trenching, archaeological investigations post-DCO and Requirement 11 of the draft Development Consent Order.</p> <p>The Applicant and Local Authorities will be asked about the level of detail in the analysis of above ground heritage assets.</p>	<p>NKDC is broadly supportive of the approach to above ground built heritage but has some concerns on the level of information particularly regarding sensitive above ground built heritage receptors and why they have been scoped out of the ES. NKDC has had meetings with applicant's consultant and is awaiting updated information as it understands more work has been done. We don't know if it will alleviate our concerns until we see it.</p> <p>NKDC agreed to identify the relevant heritage assets within the Council's LIR.</p>
<p><b>Item 10 – Landscape and Visual</b></p> <p>The Local Authorities will be asked if they have any comments on the Applicant's assessment methodology, study area and photomontage viewpoint selection.</p> <p>The Applicant will be asked questions relating to the approach to the residential visual amenity assessment.</p>	<p><b>Submissions made by Oliver Brown (AAH Consultants) on behalf of NKDC</b></p> <p>Oliver Brown for NKDC and LCC has worked with the applicant's consultant and is happy with the methodology. Assumptions on plant growth rates, based on 10 year period are generally acceptable, although at the generous end of the scale. Much will depend on the successful establishment of the plants and implementation of the Landscape and Ecological Management Plan.</p> <p>NKDC has a slight concern re the replacement of planting that fails in a ten year period. Typically, within first 5-10 years NKDC would be looking to request replacement in the DCO. As much depends on the LEMP and provision of on-site monitoring then the plant replacement period should be 15 years.</p> <p>NKDC confirmed that it is happy with the study area in the ES and that there will be no significant effects beyond that study area.</p> <p>NKDC are happy with photomontage locations as worked with applicant and visited the site to agree the locations. We agreed 12 location which would go forward, selected places that would support variety of receptors and looked at a range of views to ensure the whole story</p>

	would be told, not just short views. NKDC consider the ES does focus on receptors and viewpoints are just to demonstrate those points.
<b>Item 11 -Procedural Decisions, Review of Actions and Next Steps</b>	n/a
<b>Item 12 - Close</b>	n/a