Springwell Solar Farm

Responses to Relevant Representations

EN010149/APP/8.13
June 2025
Deadline 1
Springwell Solar Energy Farm Ltd

EP Rule 8(1)(c)
Planning Act 2008
Infrastructure Planning
(Examination Procedure(Rules 2010)

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1. Introduction

1.1. Overview

1.1.1. This report provides responses to the issues raised in the Relevant Representations ('RRs') submitted to the Planning Inspectorate in respect of the proposed Springwell Solar Farm ('the Proposed Development').

1.1.2. A total of 446no. RRs were submitted by Interested Parties ('IPs'). Of these:

- 2no were submitted by local authorities;
- 8no were submitted by parish councils;
- 10no were submitted by other statutory consultees;
- 5no were submitted by non-statutory organisations; and
- 221no were submitted by members of the public, landowners and businesses.

1.1.3. All of the RRs have been reviewed and considered by the Applicant. Technical specialists who were responsible for producing the documents that form the Applicant's application have been involved in responding to the issues raised. In providing these responses, this report provides appropriate cross-referencing to where the issues have been addressed within the DCO Application.

1.1.4. All RRs have been triaged and categorised into one of three categories:

- Category 1: Statement of Common Ground ('SoCG') parties;
- Category 2: Other Individual and Technical Stakeholders;
- Category 3: Themed Responses where similar issues have been raised by more than one IP.

1.1.5. The Applicant has initiated engagement via Statements of Common Ground ('SoCGs') with a number of parties that have submitted a RR. The issues that have been raised within the RRs by those parties have been responded to within the SoCG rather than duplicating the responses within this report. Section 2 sets out the parties with which the Applicant has a SoCG and explains the process for updating and introducing new issues into the SoCGs in light of the RRs received.

1.1.6. Other Individual and Technical Stakeholders refers to defined groups that the Applicant does not intend to enter into SoCGs with but in respect of each, the nature of the issues raised in their RRs warranted a bespoke response.

1.1.7. All other RRs from IPs that do not fall into either of the two aforementioned categories are responded to thematically within this report. Common issues raised have been grouped together according to their overarching themes. The Applicant has then provided responses to these common issues, including signposting to the relevant sections of the DCO Application documents.

1.2. Structure of this report

1.2.1. This report comprises three main sections:

- Section 2: Statement of Common Ground Parties which summarises the parties with which the Applicant has entered into SoCGs.
- Section 3: Individual and Technical Stakeholders where the Applicant has provided bespoke responses to each of the points raised within the RRs by these parties.
- Section 4: Thematic Responses which summarises the issues raised in more than one RR and the Applicant's response.

2. Relevant Representations – SoCG Parties

2.1. Overview

2.1.1. As set out in Section 1 of this report, RRs were submitted by IPs with whom the Applicant has produced a SoCG. Table 2-1 sets out these parties and the corresponding RR reference number assigned by the Planning Inspectorate.

Table 2-1: SoCG Parties

SoCG Party	RR Reference	SoCG Reference
Anglian Water Services Ltd	RR-026	[EN010149/APP/7.21] [APP-0154]
Cadent Gas Ltd	RR-048	[EN010149/APP/7.22] [APP-0155]
National Grid Electricity Transmission	RR-289	[EN010149/APP/7.23] [APP-0156]
Lincolnshire Fire and Rescue Service	n/a	[EN010149/APP/7.24] [APP-0157]
Exolum Pipeline System Ltd	n/a	[EN010149/APP/7.25] [APP-0158]
Lincolnshire County Council	RR-233	[EN010149/APP/8.1]
North Kesteven District Council	RR-305	[EN010149/APP/8.2]
Historic England	RR-159	[EN010149/APP/8.3]
Natural England	RR-291	[EN010149/APP/8.4]
Environment Agency	RR-130	[EN010149/APP/8.5]
Ministry of Defence	RR-278	[EN010149/APP/8.7]
Network Rail	RR-296	[EN010149/APP/8.8]
National Highways	RR-290	[EN010149/APP/8.9]
UK Health Security Agency	RR-429	[EN010149/APP/8.6]

2.1.2. The Applicant prefers to use the SoCGs as the primary means to communicate the status of issues with these Category 1 parties to avoid duplication of documentation. The SoCGs have been updated in light of the RRs to either update the existing issues or add new issues that were not previously raised by a stakeholder, alongside other engagement that has occurred.

2.1.3. The SoCGs and the **Statement of Commonality [EN010149/APP/7.26.2]** are 'live' documents and will continue to evolve and be updated to reflect the latest position at Deadlines 2, 3 and 5.

3. Relevant Representations – Responses to Selected Individual and Technical Stakeholders

3.1. Overview

3.1.1. This section sets out alphabetically other IPs who have submitted RRs that the Applicant has provided an individual response to, due to the nature of the stakeholder body and/or the issues raised in their RR. This excludes those parties with whom the Applicant is seeking to enter into a SoCG and those respondents captured under Category 3.

3.1.2. The list of Individual and Technical Stakeholders for which individual responses have been provided by the Applicant is as follows:

- Blankney Parish Council [RR-044];
- Butterfly Conservation Trust [RR-047];
- Cliff Villages Action Group [RR-077] and [RR-078];
- Coleby Parish Council [RR-079];
- Dr Caroline Johnson MP [RR-117];
- Digby Parish Council [RR-113];
- Dunston Parish Council [RR-120];
- Forestry Commission [RR-131];
- Metheringham Parish Council [RR-264];
- Nocton Parish Council [RR-304];
- National Grid Electricity Distribution (East Midlands) plc [RR-288];
- Scopwick and Kirkby Green Parish Council [RR-369];
- Scopwick and Kirkby Green Solar Action Group [RR-370];
- Springwell Solar Action Group [RR-383];
- Welbourn Parish Council [RR-440].

Table 3-1: Blankney Parish Council

Summary Position of Interested Party Blankney Parish Council [RR-044]	Applicant Response
General position	
Blankney Parish Council consists of six members. Three of which have pecuniary interests as far as this project is concerned. [Redacted]. It would need a quorum of at least three councillors to debate this proposal which could be achieved to discuss this application and it is more than likely that that quorum would have a small majority opposing the proposal. But it is my opinion that democracy and natural justice has to apply. Therefore Blankney Parish Council will be submitting a neutral response to this application. I am submitting this response by the powers delegated to me as Proper Officer which is contained within the council's Standing Orders.	The Applicant notes this response. The Applicant has engaged with Blankney Parish Council, in its role as a statutory consultee under section 42(1)(a) of the PA 2008, throughout the pre-application stage. This has included two phases of formal consultation and an additional, targeted consultation. It is also noted that the Planning Inspectorate formally consulted Blankney Parish Council as part of its Scoping Opinion as a relevant 'consultation body' listed in Appendix 1 in accordance with EIA Regulation 10(6). The Applicant received a formal response from Blankney Parish Council to its Phase One Consultation (24 January 2023 – 7 March 2023).

Table 3-2: Butterfly Conservation Trust

Summary Position of Interested Party Butterfly Conservation Trust [RR-047]	Applicant Response
Summary position	
Since monitoring began the mid 1970's, nationally our butterfly populations have declined by nearly 80% when, in both abundance and distribution (State of UK Butterflies 2022, Butterfly Conservation). Moths have shown a similar decline over the same period (The State	The **Outline Landscape and Ecology Management Plan (oLEMP) [EN010149/APP/7.9.2]** details landscape proposals to enhance biodiversity including new hedgerows, tree planting and creation of calcareous grassland which would provide benefit to all invertebrate species. In addition, the Applicant has responded to habitat management specific comments from the Butterfly Conservation Trust (BCT) below. The Applicant values the contribution BC has made

Summary Position of Interested Party Butterfly Conservation Trust [RR-047]	Applicant Response
of Britain's Larger Moths 2021, Butterfly Conservation). Lepidoptera, like other invertebrates, struggle in an intensively managed agricultural landscape, and species diversity and abundance would naturally be lower than in other more natural habitats found in the local wildlife sites in the study area. Although the ecological surveys have not identified any particularly important lepidoptera species in the study area, we wish to make a number of recommendations which could deliver new, well-managed habitats for butterflies and moths as part of the BNG delivery. species help the PNG proposals. By creating habitats that sustain healthy populations of butterflies and moths, this will not only deliver healthy populations of pollinators but also provide prey species for a wide range of animals including bats, birds and other insects that depend upon them. We would be happy to discuss any details of our recommendations with the applicant.	and would welcome the opportunity for further discussion when we finalise habitat management prescriptions with both BCT and the Lincolnshire Wildlife Trust.
I note that you will be following the Bat Conservation Advice on lighting, which we welcome. This advice is similar to that which Butterfly Conservation recommend to reduce significant impacts of lighting on butterfly and moth populations (https://butterfly-conservation.org/news-and-blog/streetlights-reduce-moth-populations). Research shows a wide range of impacts, including on the caterpillars and pupae found in grassy habitats under lighting (see https://advances.sciencemag.org/content/7/35/eabi8322). We would therefore request that the lighting of any	The lighting design would avoid impact on sensitive receptors by directing lighting downward and away from the Order Limit boundaries and vegetation, thereby avoiding lighting on grassy areas. During operation (including maintenance), no part of the Proposed Development would be continuously lit; manually operated and motion detection lighting would be utilised for operational and security purposes. This is secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138].

Summary Position of Interested Party Butterfly Conservation Trust [RR-047]	Applicant Response
buildings or infrastructure, minimise the effects for both bats and Lepidoptera, avoiding lighting of grassy areas.	
Finally in selecting hedgerow species I would if ask you to include species important for butterflies Alder Buckthorn for Brimstone.	The **oLEMP [[EN10149/APP/7.9.2]** sets out the species proposed for new hedgerow and woodland planting. Alder Buckthorn has been added to the proposed species mix for new hedgerow planting in the **oLEMP [EN10149/APP/7.9.2]** submitted at Deadline 1.
Environmental Statement Appendices	
Appendix 3 Table A3.2 Embedded mitigation measures Calcareous Grasslands and Neutral Grasslands - We recognise the need for the management of grass by either cutting or grazing. However, we are concerned about the proposed timing of this which covers most of the period when butterflies and moths would be active as adults or caterpillars. Grassland species using these habitats could be severely impacted by the inappropriate timing of management on either. Ideally management should aim to provide mix of short, medium and longer habitats. This could be achieved by plan for rotational grazing or cutting regimes, of different areas of grassland over a three-year cycle.	The **oLEMP [EN010149/APP/7.9.2]** sets out the proposed management of grassland habitats. Rotational grazing or cutting over a three-year cycle is more likely to be possible for the 100ha of created calcareous and neutral grassland, as operational constraints on grassland enhancement under solar PV modules may require a more regular cutting or grazing regime to ensure a regular supply of flowering legumes to benefit pollinators, and avoid coarse long grass that may shade the panels. Table A3.2 within the management schedule of the **oLEMP [EN010149/APP/7.9.2]** has been amended to prescribe arrangements for the 100 ha of grassland habitat creation for both the grass cutting and grazing management options. The management proposals for grassland enhancement underneath panels will remain the same.
Appendix 3 Table A3.2 Embedded mitigation measures Tussocky Grasslands and Open Fields and Margins with Wildflowers - We support the plan for three yearly rotational cycle for the Tussocky grasslands. However, as for the other grassland types created, we have concerns about the timing of the cuts in late summer and early autumn which could affect adults which have second or third broods during the late summer and early autumn as well as caterpillars of other species. For those areas which are to be cut within that year we recommend that cuts should	The **oLEMP [EN010149/APP/7.9.2]** sets out the proposed management of margin grassland habitats. Table A3.2 within the management schedule of the **oLEMP [EN010149/APP/7.9.2]** has been amended to prescribe cutting in Spring (March to April) alongside implementation of a rotational cutting or grazing regime.

Summary Position of Interested Party	Applicant Response
Butterfly Conservation Trust [RR-047]	
be between November and early March. Where the ground conditions do not allow this, perhaps grazing during this period, might be an option. The timing of cuts on the open field and margins with wildflowers from August onwards result similar concern not just for its impact upon butterflies and moths but also that early summer cuts may prevent flowers from having sufficient time to develop and set seed. As for the other grasslands above, a rotational cutting scheme, and or leaving until early winter would be preferable. Cuts on field margins should aim to provide a range of short, medium and longer vegetation heights which will be used by different species across the seasons. The timing of these cuts should avoid the summer months of May until September as far as possible by adopting a rotational annual regime of cutting, and minimising the amount of cutting required to maintain short swards during the summer. In 2024 Lincolnshire Branch of Butterfly Conservation surveyed RAF Cranwell, including its Local Wildlife Site Cranwell Grasslands. The LWS with its adjacent grasslands show calcareous and more neutral habitats with but still with lime-rich components. This confirmed the results of in 2010 survey by Lincolnshire Wildlife Trust, which also looked at RAF Barkstone Heath and again found calcareous grassland communities. We would suggest that the connectivity benefits the scheme should be aiming towards are the network of calcareous grassland sites along the ridge (see Figure	

Summary Position of Interested Party Butterfly Conservation Trust [RR-047]	Applicant Response
below from the RAF Cranwell report), and seeds for the grassland creation compatible with more calcareous soil conditions. Nationally our butterfly populations have declined by nearly 80% since the 1970s, in both abundance and distribution (State of UK Butterflies 2022, Butterfly Conservation). Moths have shown a similar decline over the same period. Species associated with grasslands such as Meadow Brown, Ringlet, require sensitive management: mowing or grazing in the late summer and autumn can destroy the habitats of the overwintering caterpillars or pupae. Ideally management should produce a range of sward heights, e.g., by a regime of rotational cutting or grazing over a three-year cycle to produce areas of short, medium and longer grasses.	
Volume 3 Supporting reports Chapter 6 Appendix 6, 3.3.2 Terrestrial invertebrates. The notable invertebrate species identified here, were based on BDS records from the Local Records centre. However, the LRC is aware that its records do not include recent records from the UK Butterfly Monitoring Scheme [UKBMS]. Consequently, the text mistakenly cites as notable animals, Small Blue (Cupido minimus), which has been extinct in the county since the 1880's. The sighting in the 1980's at Red Hill we believe to be and unsuccessful unofficial re introduction attempt. Wall (Lasiommata megera) has declined significantly since the 1990s and has retreated from the centre of county, with only occasional records of individuals recorded, suggesting there are no breeding colonies in this area Lincolnshire. Similarly, Grayling (Hipparchia semele),	Table 6 in **ES Volume 3, Appendix 7.1: Preliminary Ecological Appraisal [EN010149/APP/6.3.2]** outlines the desk study data used to inform the assessment. The Applicant acknowledges the update provided by BCT in that the Local Records Centre data is slightly out of date regarding some species and Table 6 has been amended to reflect this. This change does not alter the conclusions reached within the Biodiversity Chapter.

Summary Position of Interested Party Butterfly Conservation Trust [RR-047]	Applicant Response
has retreated to the Lincolnshire coast, and is now only found at Gibraltar Point NNR, and around Scunthorpe.	
Volume 3 Supporting reports Chapter 6 Appendix 6, 3.3.3 The habitats present are described as likely to support only species typical of species poor grasslands. However, a significant area of the site is shown in the DEFRA soilscapes map as shallow lime rich soil over chalk or limestone. Calcareous grasslands sites of both SSSI and local wildlife site designations are found along this limestone ridge, and the invertebrate assemblages will reflect a more species rich grassland. Areas of more neutral soils are found towards the east of the project area but are still more alkaline than neutral, although a small area to the east may have more acidic peaty soils.	The application recognises the potential for calcareous soils to potentially support grasslands with a greater wildflower and hence invertebrate assemblage. The **oLEMP [EN010149/APP/7.9.2]** sets out the biodiversity design process sitting behind the habitat creation proposals and sets out the proposed habitat creation which includes large areas (approximately 100ha) of new calcareous grassland on the limestone soils and neutral grassland elsewhere, including to extend and buffer existing roadside Local Wildlife Site (LWS) supporting remnant calcareous grassland. In addition, habitat creation proposals in Springwell East are for neutral grassland, appropriate to the neutral soil type in this area, as opposed to calcareous reflecting both changes in soil type and landscape character.
The environment statement Volume 3 Appendix 6.2, section 3.3.2 notes the presence of Wych Elm, one of the caterpillar food plant species for White-letter hairstreak, a species which has been severely impacted by Dutch Elm disease and classified as vulnerable in the GB Red List 2022. We would ask that any tree planting schemes includes Wych Elm, or resistant elm varieties to help support now vulnerable butterfly species. We would also request that the planting schemes should include buckthorn on calcareous soils, or alder buckthorn on the more neutral soil areas to benefit breeding Brimstone butterflies.	The **oLEMP [EN10149/APP/7.9]** [APP-0142] sets out the species proposed for new hedgerow and woodland planting. Wych Elm or disease resistant elm have been added to the proposed species mix for new hedgerow planting and an updated **oLEMP [EN010149/APP/7.9.2]** has been submitted at Deadline 1.
Outline Operational Environmental Management Plan	
Section 2.7.2 of the Outline Operational Environmental Management Plan: While recognising the need of lighting	The lighting design would limit impact on sensitive receptors by directing lighting away from the Order Limit boundaries and existing vegetation. During operation (including maintenance), no part

Summary Position of Interested Party Butterfly Conservation Trust [RR-047]	Applicant Response
for health and safety purposes and welcoming the intention to ensure any lighting is both downward and inward to minimise light spill, the type of lighting used can still have a significant effect upon wildlife such as bats, and moths. The Bat Conservation Trust has published guidance for lighting to minimise the impact on bats (https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/) and butterfly conservation research (https://www.science.org/doi/10.1126/sciadv.abi8322) shows a significant impact of lighting on moths. Streetlights in southern England reduce the abundance of moth caterpillars in grass verges by one-third (33%) and in hedgerows by almost a half (47%) compared to comparable unlit roadside habitats. The study also found that populations under LED streetlights were reduced by 52% in hedgerows and 43% on grass verges compared to unlit comparisons. Careful choice of LED lighting using less intense and warmer tones, typically in the range of 2000K to 4000K, and directing light downwards to avoid light leaching outwards or upwards will minimise the impact both on adult and moth caterpillars. We would wish to see these moth impact mitigation measures adopted in the mitigation and enhancement measures included within Table 3 Biodiversity, change in normal conditions.	of the Proposed Development would be continuously lit; manually operated and motion detection lighting would be utilised for operational and security purposes. This is secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138]. It may be possible to incorporate the lighting mitigation outlined by BCT but Health and Safety Executive guidelines do require minimum lighting levels for construction of 20 lux minimum and an average of 50 lux. Notwithstanding this as outlined above the lighting scheme would be designed to minimise spill on adjacent habitats. Lighting details will be approved by the Local Planning Authority under Requirement 5 (Detailed design approval) as secured within the **Draft DCO [EN010149/APP/3.1.2].**

Table 3-3: Cliff Villages Action Group

Note – the Cliff Villages Action Group and the Cliff Villages Solar Action Group submitted two RRs but the Applicant understands that they are one organisation so their responses have been combined into the table below.

Summary Position of Interested Party Cliff Villages Action Group [RR-077] and [RR-078]	Applicant Response
General position	
Wrong place, nowhere near where the energy is needed, no clear explanation about choice of site, too large changing the nature of the landscape, disadvantages to our communities outweigh any advantages. It's too big. Solar panels shouldn't be on farm land. They aren't even being made in this country.	The **Site Selection Report** at **Appendix 1** of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development. It also describes the evolution of the design of the Proposed Development and the main alternatives considered. The Site was selected because it presents the physical characteristics which are highly supportive in terms of the ability to deliver a NSIP scale solar development. The Site: • has a grid connection offer which will see energy transported to the national transmission network by 2030, and sufficient land to enable the grid connection offer to be maximised while maintaining sufficient offsets to sensitive residential receptors; • lies within an area of suitable irradiance and favourable topography; • includes a proportion of BMV land which is characteristic of the predominating mix in the general locality and less than the Lincolnshire average; • is located away from key environmental and cultural heritage related designations; • is on land which is available and may be voluntarily acquired with landowners enabling efficiencies in delivery; • is accessible from the road network and has suitable access to land not immediately adjacent the strategic road network. Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*"

Summary Position of Interested Party Cliff Villages Action Group [RR-077] and [RR-078]	Applicant Response
	Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3. Consideration was therefore given to areas in the UK where there was capacity in the network to take power generated by new renewable energy projects, including solar development. The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010149/APP/7.2.2]** [AS-018] sets out the justification for the Proposed Development, including its size and location. The Proposed Development equates to an output of 1MW per 2.4 acres, representing an efficient use of the land for solar PV and associated infrastructure within the range identified in paragraph 2.10.17 of NPS EN-3. The **Statement of Need [EN010149/APP/7.1]** [APP-0135] demonstrates how the overwhelming national need outweighs any potential significant adverse impacts which, as the **Environmental Statement** sets out, are limited. The substantial benefits and need for the Proposed Development as set out in Section 3 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**,** including the delivery of CNP Infrastructure to contribute towards meeting national energy objectives, outweighs the residual landscape effects when applying the planning balancing exercise to the Proposed Development with no requirement to demonstrate exceptional circumstances given that the presumption for allowing the DCO. The **Design Approach Document [EN010149/APP/7.3.2]** demonstrates how the Proposed Development has been developed in accordance with the criteria for good design set out within NPS EN-1 and NPS EN-3. It explains how the Proposed Development has been developed via an iterative design and EIA process using Project Principles to guide design related decision making. This includes the provision of appropriate offsets to local settlements and dwellings on a case-by-case basis (Principle 1.2) and maintaining the rural separation between the villages of Ashby de la

Summary Position of Interested Party Cliff Villages Action Group [RR-077] and [RR-078]	Applicant Response
	Launde, RAF Digby, Scopwick, Kirkby Green and Blankney (Principle 2.3). Overall, this ensures that the Proposed Development achieves an appropriate and sensitive design response which is secured by the **Design Commitments [EN010149/APP/7.4]** [APP-0138]. The Applicant recognises the concerns regarding landscape change and undertook an assessment to determine the likely significant effects on landscape and visual amenity. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] reports that likely significant effects on landscape character would occur at Year 1 of operation within defined parts of Landscape Character Area 7 (LCA 7): Limestone Heath and Landscape Character Area 11 (LCA 11): Central Clays and Gravels. By Year 10, likely significant effects on landscape character would remain within the defined parts of LCA 7: Limestone Heath but effects in LCA 11: Central Clays and Gravels would be not significant. The character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale solar PV development. The effect on landscape character would arise principally from a change in land cover; ostensibly the introduction of new Solar PV development, Satellite Collector Compounds, BESS, Springwell Substation and ancillary infrastructure such as fencing and CCTV into fields which are currently in agricultural land use. The Solar PV development would, however, be underlain by wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site. The extent of manufactured metallic and glass structures introduced into the landscape will be more than exists in the landscape at present but this tract of the landscape is not wild or natural without human influence. It is an intensively farmed, working landscape with some strong built influences such as the A15, overhead powerlines, RAF Digby and occasional utilitarian agricultural buildings. The landform, pattern and underlying landscape fabric of the Order Limits would remain largely undisturbed. Due to gentle landform across the Order Limits, the existing framework of woodlands, tree belts and hedgerows proposed, combined with strategic gaps between the three parcels, the Solar PV Site would appear subdivided and compartmentalised. The Applicant intends to provide additional benefits for the community through the enhancement of 2km of existing PRoWs and provision of approximately 3.52km of additional PRoW and 8.69km of permissive paths, provision of a community growing area of up to approximately 2ha to the

Summary Position of Interested Party Cliff Villages Action Group [RR-077] and [RR-078]	Applicant Response
	north of Scopwick, a community fund of £400 per megawatt of installed capacity per year from the start of operation and lasting throughout the lifetime of the Proposed Development, and creating direct and indirect effects associated with employment, skills and education. The Applicant intends to promote economic benefits for the community through the activities set out in the **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153]. In response to the location of the manufacturing of the Solar PV modules, **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1]** [APP-048] presents a full lifecycle assessment taking into account the emissions associated with the manufacture and transport of materials and components from source countries and displays those emissions in tCO2e. The GHG savings of the Proposed Development outweigh the emissions associated with its construction, operation (including maintenance and replacement), and decommissioning, resulting in net GHG savings of over 9.6 million tonnes of CO2e. The Applicant opposes the abuse of human rights and forced labour anywhere in the global supply chain. As part of the procurement process, the Applicant would take a rigorous approach to ensuring its suppliers comply with relevant legislation (such as the Modern Slavery Act 2015) and its requirements as set out in an ethical procurement policy as detailed in the **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153].
Concern about the impact upon the Cliff Villages, for example, impact on the highway network of construction traffic	**ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010] and **ES Volume 3, Appendix 14.1: Transport Assessment [EN010149/APP/6.3]** [APP-123] set out the potential for traffic impact on the settlements that the Cliff Villages Action Group represent, noting that no construction traffic is proposing to use the A607 or will pass through the settlements of Navenby, Wellingore, Welbourn, Leadenham or Caythorpe. The increase in traffic on the A15 closest to the villages represented by the Cliff Villages Action Group (noting no traffic passes through the villages themselves or uses the A607 itself) is between 2% and 4% during the peak of construction and well below the 10% threshold for undertaking a traffic assessment.

Summary Position of Interested Party Cliff Villages Action Group [RR-077] and [RR-078]	Applicant Response
	Suitable mitigation measures for the road network that construction traffic uses are outlined in the **Outline Construction Traffic Management Plan (oCTMP) [EN010149/APP/7.8.2]**. Measures detailed in the oCTMP include setting approved access routes for HGV traffic, road signage strategy, a Staff Travel Plan, Community Liaison Group / Traffic Management Working Group, monitoring of the traffic management measures and effective enforcement measures. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures outlined in the **oCTMP [EN010149/APP/7.8.2].**

Table 3-4: Coleby Parish Council

Summary Position of Interested Party Coleby Parish Council [**RR-079**]	Applicant Response
General - Impacts on residential amenity and property value	
The Parish Council has had comments from residents concerned about the economic impact upon them as householders, recent surveys showing that properties close to solar parks have less desirability and therefore reduced value. These concerns should be addressed. It is understood that there will be Mitigation for local residents via grants probably managed by local authorities however it would appear that any funds provided by the developer will be based on the kWh generated each year and therefore is unlikely to be available to local residents until well after the solar park has been operational so some considerable time in the future. This mitigation does not therefore assist local residents in the development period of the solar park yet	The UK Government has established a critical national priority (CNP) for large-scale, low-carbon energy infrastructure under NPS EN-1, emphasising the urgent need for projects like the Proposed Development to achieve national energy security, economic growth, and net-zero targets (EN-1, Paragraphs 3.1.1, 3.2.6–3.2.8, and 3.3.63). Solar PV developments of this scale (over 50MW) are recognised as essential components of the UK's energy strategy, and the substantial benefits they deliver are considered to outweigh residual impacts that cannot be mitigated. ***Property Values:*** Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. Following the Phase Two Consultation, the Applicant refined the development boundary, removing 68 Category

Summary Position of Interested Party Coleby Parish Council [**RR-079**]	Applicant Response
they will have all the disruption and loss of property value.	1 and 2 persons and all 154 Category 3 persons initially identified. After diligent inquiry, the Applicant does not consider there to be any remaining Category 3 persons. ***Planning Balance, Mitigation Measures, and Enhancements:*** The Proposed Development has been designed with robust mitigation measures to minimise environmental and community impacts. These measures are secured through the DCO and detailed in **ES Volume 1, Chapter 17: Mitigation Schedule [EN010149/APP/6.1]** [APP-057], ensuring that adverse effects are reduced during construction, operation, and decommissioning. As part of the Planning Balance assessment (Section 9 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]), the Applicant has committed to delivering significant community benefits as part of the Proposed Development, which include: • Biodiversity Net Gain, enhancing local habitats and wildlife sustainability. • New Public Rights of Way (PRoWs) and permissive paths, improving community access and local recreation. • A community growing area and new employment opportunities, supporting local development and sustainability. These enhancements are factored into the planning balance, weighing the national significance and sustainability benefits of the project against local impacts. National policy under NPS EN-1 and EN-3 explicitly supports renewable energy projects where the public interest and economic benefits outweigh residual impacts. ***Community Benefit Fund:*** Although not a material consideration for the Secretary of State, the Applicant proposes a Community Benefit Fund of £400 per megawatt of installed capacity per year, available throughout the Proposed Development's operational life. This fund, managed independently in partnership with the community, aims to support local initiatives and address community priorities, directly benefiting local residents.
Land use	

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The Parish Council objects on the basis of the loss of good agricultural land at a time of heightened food anxiety. The UK needs to be able to feed its population and at a time of geopolitical instability the use of good agricultural land for energy production seems counterproductive. Lincolnshire is one of the main food producing areas of the UK and the land should be maintained as agricultural land for food production.	The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of Best and Most Versatile (BMV) land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. Revisions to the NPPF 2024 have amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. The Proposed Development will result in the temporary use of some BMV agricultural land for solar development, cabling, access tracks and green infrastructure, together with some permanent use for green infrastructure only. The amount of BMV agricultural land used has been minimised through the site selection and design development process as outlined in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** [APP-044]; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely.
Landscape and visual impacts	
Coleby Parish Council comments upon and objects to the proposed plans for a solar and energy storage	At its closest, Coleby Parish lies approximately 4.5km north of the nearest above ground component of the Proposed Development, namely the proposed Springwell Substation. **ES**

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project by Springwell to the east of the A607 and Navenby. The Parish of Coleby lies to the west of the proposed solar and energy storage site. The village of Coleby is a conservation village and sits within a rural, agricultural setting in an area designated as a character area in the North Kesteven District Council Landscape Character Assessment (2007). The Parish is situated on the Lincoln Cliff Edge with scenic views over the Brant and Witham Valleys. The site of the proposed solar and energy park is to the east of the village on the area known as the Lincoln Heath. The proposed project will have significant impact on the views over the Lincoln Heath. It is this impact on the character of the landscape that creates the most concern for Coleby Parish Council and the residents of the parish. The Parish Council recognises that there is a need for carbon neutral energy production but is concerned about this project and sets out its grounds for Objecting to the development proposed: Industrialisation of the area: An area which is intensively rural would become industrialised by the installation of this solar park and its consequential infrastructure to the detriment of the local area, environment and people. The scale and extent of this proposed solar park and many other solar park applications within Lincolnshire will change the nature of the countryside to the detriment of all. The sensitivity of the Lincoln Heath area means such development could be particularly harmful to the landscape character and integrity. The addition of prominent infrastructure on the Lincoln Heath and possibly across the Lincoln Cliff is a further pressure that is likely to erode the special character of this sub-area and therefore requires specific	**Volume 2, Figure 10.9: Siting Zone for Springwell Substation and Main Collector Compound ZTV [EN010149/APP/6.2]** [APP-066] demonstrates that no part of the Springwell Substation would be visible from any residential property, road or Public Right of Way within Coleby Parish. As Springwell Substation would comprise the tallest structures within the Proposed Development it can further be concluded that no part of the Proposed Development would be visible from Coleby Parish. As such, there would be a negligible landscape and visual impact within Coleby Parish. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] confirms that the Proposed Development would have no effect on views over the Brant and Witham Valleys which lie to the west of the Lincoln Cliff. For clarification, the Proposed Development is not located across the heath to the east of Coleby Parish and there would be no view of solar development across the heath when viewed from Coleby Parish. It is however acknowledged that the western and southern parcels of the Proposed Development are located further south within Landscape Character Area 7 (LCA 7): Limestone Heath. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] reports that there would be a significant effect on LCA 7: Limestone Heath. This would occur across a tract of the LCA from Heath Lane in the north to just south of Dunston Pit Plantation, extending west of the A15 as far as Wellingore Heath, Temple Bruer and Brauncewell; to the east of the A15, extending up to Heath Road as far as RAF Digby; on the eastern side of Heath Road, extending up to a series of plantations to the east including Bloxham Woods, Ashby Thorns, Rowston Covert; and across the tract of land between RAF Digby, Scopwick, the B1188 and Rowston Covert. The sensitivity of Landscape Character Area 7 (LCA 7): Limestone Heath to the type of development proposed is reported in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] as medium/low. A full assessment and further justification for this judgement is presented in **ES Volume 3, Appendix 10.2: Baseline Landscape Character Appraisal [EN010149/APP/6.3]** [APP-108] and **ES Volume 3, Appendix 10.3: Landscape Sensitivity Appraisal [EN010149/APP/6.3]** [APP-109]**.** **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] acknowledges that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale solar PV development, but the Applicant does not consider the terms ‘industrialisation’ and ‘industrialised’ applicable to the Proposed Development.

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and firm policy protection in spatial plans to ensure insensitive development can be resisted in order to protect landscape quality.	The effect on landscape character would arise principally from a change in land cover; ostensibly the introduction of new Solar PV development, Satellite Collector Compounds, BESS, Springwell Substation and ancillary infrastructure such as fencing and CCTV into fields which are currently in agricultural land use. The Solar PV development would, however, be underlain by wildflower rich grassland maintaining a vegetative ground cover throughout the majority of the Site. The extent of manufactured metallic and glass structures introduced into the landscape would be far greater than exists in the landscape at present, but this tract of the landscape is not wild or natural without human influence. It is an intensively farmed, working landscape with some strong built influences such as the A15, overhead powerlines, RAF Digby and occasional utilitarian agricultural buildings. The landform, pattern and underlying landscape fabric of the Order Limits would remain largely undisturbed. No significant cumulative effects on landscape character have been identified with other solar farm developments in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].**
The scale and extent of development would also lead to significant adverse effects on views from receptors, changing from views within an agricultural or rural landscape to that of a landscape containing large scale solar development.	As noted above, no part of the Proposed Development would be visible from Coleby Parish. As such, there would be a negligible visual impact on receptors within Coleby Parish. Visual effects on receptors in the wider landscape are assessed in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] where it is acknowledged that some significant visual effects would occur. Table 10.13 in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] provides a summary of those locations and receptors which would experience significant visual effects.
Principle of development	
The Parish Council is concerned that the solar park will not provide the energy suggested in the application purely on the grounds of lack of sunshine and is therefore not a viable means of providing energy. This raises the question as to whether the wholesale industrialisation of the landscape is worth the benefit to be gained from such a development.	Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the*

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	mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible." Projects are needed to deliver energy at scale, as discussed in Section 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135], which concludes that the development of large sites is essential to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity in the national grid where it occurs. Consideration was therefore given to areas in the UK where grid connections were available and suitable for solar development, in parts of the country where irradiance was suitably high. As shown on Figure 7-2 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135], this includes Lincolnshire and the areas within the Order Limits. The **Site Selection Report** at Appendix 1 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development. It also describes the evolution of the design of the Proposed Development and the main alternatives considered.
The development is not taking place within a National Strategic Energy Plan which identifies energy consumption requirements, and the energy production mix required to meet these including nuclear, wind and wave, solar, hydrogen and other new technology initiatives etc. The Parish Council believes that the manufacture and construction of alternative sources of energy should form part of a national industrial strategy and be developed and manufactured in the UK by British Companies. Springwell Solar Park is a development by EDF Renewables UK is part of a French company which sources its panels partly from UK Manufacturers but as with all solar panels at least part of those panels will have been produced in China, where about 60% of the grid is accounted for by coal-powered energy plants.	Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*" NPS EN-1 explains at Para 3.3.20 that *"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar",* and the government's Clean Power 2030 Action Plan states that to deliver a path to clean power, the government has *"high ambition. That means 43-50 GW of offshore wind, 27-29 GW of onshore wind, and 45-47 GW of solar power, significantly reducing our fossil-fuel dependency.*"

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	Projects are needed to deliver energy at scale, as discussed in Section 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135], which concludes that the development of large sites is essential to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** [APP-044] sets out the Applicant's approach to alternatives with regard to all relevant issues, including locations and technologies. The assessment concludes that there are no reasonable alternative technologies that could deliver the Applicant's objectives within the same timeframe at this location, which accords with the intent of NPS EN-1 para. 4.3.22. While the procurement process for the Proposed Development has not yet begun, the Applicant has considered potential environmental impacts associated with the manufacturing and transport of components of the Proposed Development as part of the full lifecycle assessment presented in **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1]** [APP-048]. This takes into account the emissions associated with the manufacture and transport of materials and components from source countries (including China as a part of Asia) and displays those emissions in tCO2e. The GHG savings of the Proposed Development outweigh the emissions associated with its construction, operation (including maintenance and replacement), and decommissioning, resulting in net GHG savings of over 9.6 million tonnes of CO2e. The Applicant opposes the abuse of human rights and forced labour anywhere in the global supply chain. As part of the procurement process, the Applicant would take a rigorous approach to ensuring its suppliers comply with relevant legislation (such as the Modern Slavery Act 2015) and its requirements as set out in an ethical procurement policy as detailed in the **Outline Skills, Supply Chain and Employment Plan [EN010149/APP/7.20]** [APP-0153].
Socio-economics	
The Parish Council accepts that there needs to be alternatives to carbon creating energy supplies and that there is the proposal that communities local to such	The Applicant acknowledges the Parish's concern. However, it is important to note that many of the benefits of the Proposed Development for the immediate local community will be realised before it becomes operational. As outlined in the Planning Statement **[EN010149/APP/7.2.2]** [AS-

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developments will be compensated, however the Parish Council understands that this will not be until the development is operational, which could be another 10 years or so, and therefore any immediate benefit to those having to live close to such developments is non-existent. The Parish Council requests that the company consider its objections constructively when dealing with this Statutory Consultation.	018], in addition to making a significant contribution towards meeting policy commitments and legal decarbonisation targets for securing renewable energy, these benefits occur during different stages of the Proposed Development's lifetime. The Proposed Development includes the following other benefits, of which, some will become available during of the construction phase, as detailed below: Provision of an **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153], which will: - Increase direct and indirect employment and opportunities during construction and operation of the Proposed Development; - Lever potential of the Proposed Development and other similar schemes in the local area, to encourage the next generation to take up careers in the renewable energy sector and invest their futures in Lincolnshire; - Engage effectively with local businesses and wider supply chain, and - Assist in development and dissemination of local knowledge and skills relating to renewable energy infrastructure. - The Applicant has an established record of adding legacy value through supply chains and has committed to promoting the delivery of economic benefits generated by the Proposed Development to residents and business. on the Proposed Development and catalysing increased capabilities and specialisms in green construction and manufacturing across Lincolnshire. This is set out within the **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153]. • Proposed enhancements and improvements to the local footpath and cycle network including the provision of new PRoWs: - Linking RAF Digby to Scopwick. This footpath will be created and made available at the beginning of the construction phase. - Providing a connection between the existing PRoW west of the A15 to New England Lane. - Providing a connection across the A15 by linking Temple Road to Bloxham Woods Car Park.

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- The creation of four new permissive paths:
  - A new permissive path along the western edge of the Proposed Development linking New England Lane to Temple Road, north of Brauncewell (approx. length 4,130m).
  - A new permissive path connecting the B1191 (Heath Road) with the existing PRoW between RAF Digby and Rowston (Rows/5/1) (approx. length 1,610m).
  - A new permissive path linking Bloxholm Wood to Brauncewell Village (approx. length 1,120m).
  - New permissive paths to provide a series of circular walking loops from Bloxholm Woods (approx. length 1,720m).
- In addition to this, proposals include the enhancement of 2km of existing PRoW, which will attract new users to the area and make this green infrastructure more accessible to local residents and tourists. The overall impact of the Proposed Development on users of PRoW and permissive paths during the operational phase will be slightly beneficial through the creation of new routes, increasing connectivity and access to green spaces within the study area.
- A new community growing area to the north of Scopwick. The community growing area would be located adjacent to existing community facilities along Vicarage Lane (including Scopwick Cemetery, park and play area) and is adjacent to the Spires and Steeples Trail and Stepping Out Scopwick Loop. The community growing area would be secured via the **oLEMP [EN10149/APP/7.9.2]** and allows for permissive access 364 days a year to an area of up to 2ha for community use during the operation of the Proposed Development. The detailed design of the space would be developed post-DCO consent in conjunction with the Community Liaison Group.
- Providing a variety of biodiversity benefits including: new habitat for invertebrates, reptiles, amphibians, small mammals and birds; vegetated cover for foraging and dispersal, to maintain bat flight lines across the landscape, and provide a winter seed source for birds set out within the **oLEMP [EN10149/APP/7.9.2]**.
- The Proposed Development commits to delivering a minimum Biodiversity Net Gain of 10% as secured within the **oLEMP [EN10149/APP/7.9.2]**. This has been assessed through the **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095].

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	While not a consideration for the SoS, the Applicant is proposing a Community Fund of £400 per megawatt of installed capacity per year from the start of operation lasting throughout the lifetime of the Proposed Development. It is envisaged that it would be managed by an independent third party and delivered in partnership with the local community. Local people would be able to advise on the fund strategy and spend, to prioritise issues that are important to the local area.
Traffic and transport	
The disruption in the local area during installation and decommissioning may be considerable and with the road infrastructure in the area being poor, this will exacerbate traffic problems. The construction and operation of the completed solar park will result in disruption to local residents and businesses using an already overstretched road network, with resulting damage to roads already in need of major repair work. This gives rise to concerns for the safety of local road users, both vehicular, pedestrian and cyclist. The construction and subsequent decommissioning in what is now a 60-year project will cause damage to the environment and loss of amenity and value to local residents.	**ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010] and **ES Volume 3, Appendix 14.1: Transport Assessment [EN010149/APP/6.3]** [APP-123] set out the potential for traffic impact on the study area road network, noting that no constriction traffic will pass through the village of Coleby. A review of the baseline traffic conditions has been undertaken to allow an accurate review of traffic impact to be assessed. The overall transport assessment has considered the effects on severance, driver delay, pedestrian delay, non-motorised user amenity, fear / intimidation and road safety. No long term, significant effects are anticipated. The increase in traffic on the A15 closest to Coleby (noting no traffic passes through Coleby itself) is 4% during the peak of construction, which is well below the 10% threshold for undertaking a traffic assessment. The predicted level of traffic during decommissioning will be similar or less than that associated with the construction phase and as such, it is likely that any impacts would be similar. Proposed mitigation measures are outlined in the **oCTMP [EN010149/APP/7.8.2]** including a commitment to undertake a Highways Condition Survey to ensure that the highways network is safe and appropriate for all users.

Table 3-5: Dr Caroline Johnson MP

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Biodiversity	
With regard to habitat loss, Springwell's scoping report says (page 81) that "Although construction of the Project Substation, National Grid substation, BESS and associated compounds would result in loss of habitat during the construction and operational phase and the installation of solar panels could cause habitat degradation of species-rich grassland during the operational phase, i.e. by creating dominance of shade tolerant species, mitigation is proposed so that significant effects would not occur (refer to Section 6.2.9 below). However, potential impacts on the land yet to be surveyed (refer to Section 6.2.4 above) are currently unknown". The loss of biodiversity must be acknowledged when determining this application.	The Applicant's Scoping Report was produced before habitat and further species surveys had been completed. All habitat and further species surveys within the Order Limits necessary to inform the ES assessment were subsequently completed and no species-rich grassland has been identified, other than some road verge Local Wildlife Sites which are fully assessed and mitigated within the assessment. Details of the surveys undertaken are shown in **ES Volume 3, Appendices 7.1-7.13 [EN10149/APP/6.3]** [APP-082] – [APP-094]. The entirety of the area within the Order Limits, and also adjacent habitat, has been subject to UK Habitat survey with more detailed surveys as appropriate (arable plants and hedgerows for example) so the Applicant had a full baseline against which to assess the impacts of the proposals. The impact on biodiversity is assessed in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2].** No significant residual adverse effects on biodiversity are anticipated as a result of the embedded design and mitigation proposals. Habitat enhancement proposals are anticipated to provide significant beneficial effects. **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095] provides indicative figures substantially above the minimum 10% BNG commitment, demonstrating that the Applicant is expecting to deliver in excess of the minimum. The habitat condition criteria that must be reached to deliver the gain in biodiversity is set out within **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095] and will form the basis of post construction monitoring ensuring that the predicted uplift is delivered. This is secured by the **oLEMP [EN10149/APP/7.9.2]**.
There are several red kites nesting in the proposed area, specifically around Scopwick House. The protection of the red kite is the longest continuous conservation project in the world (according to the RSPB), beginning in 1903. Protected by the Wildlife and Countryside Act 1981, it is illegal to kill, injure or disturb them. A further	Breeding bird surveys carried out throughout the Order Limits and surrounding area did not identify any Schedule 1 bird species breeding within at least 100m of the Order Limits except for barn owl. The impact on barn owl is assessed in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]**. No significant adverse residual effects on barn owl are anticipated. Habitat enhancement proposals, for example to enhance field margins, are anticipated to provide residual beneficial effect on barn owls. The breeding bird survey results are detailed in **ES Volume 3,**

Summary Position of Interested Party Dr Caroline Johnson [RR-117]	Applicant Response
37 bird species were recorded by Springwell's scoping report (p77) as being within 2km of the site. They include the marsh harrier, the hen harrier, the kingfisher, the peregrine, and the woodlark. Fifteen species in total are included in Schedule 1 of the Wildlife and Countryside Act 1981, making it illegal to intentionally or recklessly disturb them whilst nesting, building a nest, or in or near a nest containing eggs or young.	**Appendix 7.2: Breeding Bird Surveys [EN10149/APP/6.3]** [APP-083]. The barn owl survey is detailed in **ES Volume 3, Appendix 7.4: Barn Owl Survey - Confidential [EN10149/APP/6.3]** [APP-085] which is confidential to protect barn owl breeding sites. **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** outlines best practice mitigation measures to ensure legislative compliance regards breeding birds, such as vegetation removal outside of the bird breeding season. However it is acknowledged that may still be potential disturbance to barn owl, which is listed in Schedule 1 of the Wildlife and Countryside Act 1981. In addition to the best practice measures, the **oLEMP [EN10149/APP/7.9.2]** outlines pre-construction surveys that will occur. This will include nesting bird survey and if bird species, including those protected under Schedule 1, are likely to be directly affected then appropriate mitigation measures will be put in place to ensure legislative compliance.
Community Impacts	
The impacts of these applications on the community should be considered, with the loss of nature and biodiversity, impact on house prices and the mental health effects of the industrialisation in this area of usual tranquil rurality.	**ES Volume 1, Chapters 6 – 15 [EN010149/APP/6.1]** [APP-046] – [APP-055] outline the assessments and the proposed mitigation and monitoring measures for each respective environmental factor. These chapters provide an overview of how the Applicant plans to minimise the impact on the sensitive receptors, including the community. The ES identifies measures to avoid, prevent, reduce or, if possible, offset any likely significant adverse effects on the environment. These measures are designed to address concerns such as visual impact, noise, traffic, and ecological effects. The ES also identifies residual effects remaining following the implementation of mitigation measures.
Land Use	
The impact of this application on the availability of BMV land in the area will be significant. According to the January 2025 Planning Statement EN010149/APP/7.2.2, the vast majority of the Order Limits site is shown as Grade 2 and/or Grade 3 on the ALC survey conducted in 2023. The report states that percentages of best and most versatile (BMV) land across the site calculated to date show that 87.4% of the site is Grade 2 or 3. Grade	Policy in NPS EN-1 and NPS EN-3 recognises that solar development may take place on agricultural land, but that Applicants should not site their scheme on Best and Most Versatile (BMV) agricultural land without justification and, where demonstrated to be necessary, that the poorer quality land should be preferred over higher quality. National policy in NPS EN-1 and NPS EN-3 as set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] distinguishes between the use of BMV (Grades 1, 2 and 3a) and non-BMV (3b and 4). While 3b may still be farmable, it is not considered by policy to be of sufficient quality to be defined as BMV agricultural land.

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3a land is BMV land, and Grade 3b land remains farmable. Like the NPPF, the updated NPS EN-3 recommends that developers should try using poorer-quality instead of higher-quality agricultural land and avoid the use of BMV land where possible. In a written statement in May 2024, the previous government offered further guidance on the use of BMV land for solar farms instead of food production. It explained how these "competing priorities" should be balanced, clarifying the policies set out in the NPS: • The "starting position" for developers should be to minimise the impact on BMV land and use land in areas of poorer quality. There is "a greater onus" on developers to show the use of higher-quality land is necessary as land grade increases. • Decision-makers should give "due weight" to the proposed use of BMV land when considering whether consent should be granted. • The government added that decision-makers should not only consider the impacts of individual proposals but also cumulative impacts "where several proposals come forward in the same locality". 3,163 acres of agricultural land could produce 11,386 tonnes of wheat – 7.97 million loaves of bread or 234 million Weetabix. It is claimed that this site could be out of agricultural use for up to 40 years. In this time, technology will have significantly advanced, and the soil	The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of BMV land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The Applicant has sought to reduce impacts on BMV land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. This has influenced both the initial site selection process and the subsequent design evolution of the Proposed Development. This includes retaining fields for arable production that comprise solely of Grade 1 or 2 land. It would not be possible to advance with this project without the use of some BMV land, and the Applicant has provided further justification for this, as referenced in Section 11.9 of **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** and within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.** The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. As set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] at paragraph 8.8.15 onwards, out of the 1280ha of land within the Order Limits, 231.7ha is BMV, which is proposed to be utilised for hard infrastructure, i.e.

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underneath these outdated panels will have been deprived of light, rendering it much poorer quality for future generations—again creating devastating impacts for food security into the future. Due weight must be given to the amount of BMV land which will be taken up by the proposal and, on this basis, the application should not be recommended.	collector compounds, Springwell Substation, Solar PV development, and BESS. A further 108.8ha of BMV land is proposed to be used for Green Infrastructure, with the remainder (200.7ha) required for the installation of cabling, which will be available for agricultural use once the cable has been installed. The area of BMV agricultural land which will therefore be unable to be farmed while the development is in place (up to 40 years) therefore represents approximately 26% of the Order Limits. This increases to 42% if the area to be temporarily out of use while the cable is being laid is included. In total 58ha of Grade 1 and 2 land within Order Limits and 207.9ha of Grade 3a land is proposed to be available for arable or other agricultural use. Paragraph 2.10.145 of NPS EN-3 advises that the SoS should "*take into account the economic and other benefits of the best and most versatile land*". In this context, the Order Limits comprise agricultural landholdings, with a mixture of arable output used for various purposes as set out above both on BMV and non-BMV land. The proposed extent of the solar development represents a proportion of the wider landholding. In fact, the amount of BMV which would be required to be used for hard infrastructure (231.7ha), represents just over 4% of the wider Blankney Estate's landholding (5,665ha). No key infrastructure, such as main agricultural buildings, is impacted, and the Proposed Development has been designed to ensure that it does not conflict with the wider business functions. However, there will inevitably be changes in the day-to-day farm management and operation given the extent of the land required for the Proposed Development. The income the landholding would receive from the land rental will play an important role in securing the ongoing viability of the estate and a form of diversification which will help secure the estate's long-term future. The other critical factor in the consideration of impacts on BMV is the degree of impact which it is deemed to have. The Proposed Development has an operational life of 40 years after which time all hard infrastructure above ground and below ground to a depth of 1m, with the exception of cabling, would be removed from the land (as secured within the **Outline Decommissioning Environmental Management Plan (oDEMP) [EN010149/APP/7.13.2].** For the vast majority of the site, this equates to the removal of solar PV panels, which are mounted on narrow piles and have no demonstrable impact on the quality or condition of the ground below. Following the removal of solar infrastructure and land restoration, as detailed in the **outline Soil Management**

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	Plan (oSMP) [EN010149/APP/7.11.2], land is expected to return to its original agricultural quality and levels of crop production.
Local Opposition - Last year, I conducted a survey in my constituency in the areas most affected by the large-scale NSIP applications in our area, including Springwell Solar Farm. Letters were sent directly to thousands of households in Sleaford and North Hykeham, and I received over 2,000 handwritten responses. These were not simple online forms that could be clicked and submitted multiple times; they were thought-out responses, many of which contained pages of heartfelt comments. Of the respondents, 90% were concerned about the enormous scale of the proposals, 68% were extremely concerned about the use of productive farmland, and 55% were extremely concerned about the visual impact. Lincolnshire is the nation's breadbasket and produces 30% of the UK's vegetables. My constituents understand the importance of backing our farmers. This is why the most common response from my survey was that we must protect our prime agricultural land in the interests of food security. I fear that NSIP applications such as this one take out a level of local decision making, bypassing local authorities and local people to an extent, however, the responses to my survey and local feeling on this issue speaks volumes. Our Net Zero transition is important, but, unfortunately, the consequences of these applications signify a shift from small, unobtrusive solar farms on brownfield sites and poor-quality land, to massive industrial installations in completely the wrong places based merely on grid connection. The company has no ties to the land and no	The Applicant has carried out significant consultation on the Proposed Development as set out in the **Consultation Report [EN010149/APP/5.1]** [APP-019] and has sought to incorporate changes that address local concerns. These key changes are set out in the Consultation Report at paragraphs 2.8.5 and 6.5.1 and include: • Reduction in area of Solar PV development to 816ha from 1,438ha shown previously following the Phase One consultation and a further reduction to 594ha following the Phase Two consultation; • Removal of fields proposed for Solar PV with high residential amenity impacts; • Removal of fields proposed for Solar PV to provide visual breaks between settlements; • Offsetting Solar PV development from either side of the B1191 between Ashby de la Launde and Scopwick; • Incorporating new permissive footpaths; • Reducing the maximum proposed height of Solar PV modules from 3.5m to 3m, other than in areas of flood risk; • Refining locations of proposed electrical infrastructure, including substations and satellite collector compounds to reduce potential visual impact; • Locating cable route away from residential properties. Through these changes, the Applicant is seeking to address local views, whilst balancing this with the need to deliver significant levels of renewable energy development at considerable pace. The **Statement of Need [EN010149/APP/7.1]** [APP-0135] explains at Para 1.1.3 that *"Urgent and unprecedented actions are required on a global scale to halt climate change. A rapid increase in the supply of low carbon electricity is needed for the UK to meet its legally binding climate change targets. Solar generation is a critical part of the UK's strategy to achieve net zero by 2050"*. Section 6.10 of the **Statement of Need [APP-135]** describes why large-scale solar is essential to support the UK to achieve Net Zero, and **Statement of Need [APP-135]** Para 3.15.7 states that "To deliver the government' ambition, the equivalent of approximately one large-scale solar

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stake in its preservation. I urge you to not recommend this application.	scheme would need to be switched on each and every month between now and 2030, between August 2024 and 2030." Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3. On this basis, the development of large sites (which connect to the transmission network) is essential to connect the scale of new capacity required to meet Net Zero requirements. Therefore, the emphasis should be on maximising the use of available capacity in the national grid where it occurs. Consideration was, therefore, given to areas in the UK where there was capacity in the network to take power generated by new renewable energy projects, including solar development. The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010149/APP/7.2.2]** [AS-018] sets out the justification for the Proposed Development, including its size and location. The Proposed Development equates to an output of 1MW per 2.4 acres, representing an efficient use of the land for solar PV and associated infrastructure within the range identified in paragraph 2.10.17 of NPS EN-3. **Appendix 3 - Policy Compliance Assessment Tables** of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] provide detailed evidence of compliance with relevant national and local policy documents and a comprehensive assessment. The design of the Proposed Development that evolved over the pre-application period is available in the **Design Approach Document [EN010149/APP/7.3.2]**. Section 9 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as

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	demonstrated in the **Statement of Need [EN010149/APP/7.1]** [APP-0135] outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited. An assessment of the inter-project cumulative effects with other existing development and/or approved developments is presented in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].** This assessment considers the potential combined impacts of Springwell Solar Farm alongside other nearby projects and outlines that no significant inter-project cumulative effects are anticipated. The Secretary of State is responsible for the approval or refusal of the Application based on the Examining Authority recommendation. However, the requirements within Schedule 2 of the **Draft DCO [EN010149/APP/3.1.2]** are approved by the relevant planning authority, including detailed design, e.g., layout, scale, external appearance, and management plans. It is also noted that breach of a DCO is a criminal offence, and with the various mitigation measures secured in the DCO, the responsible building of the Proposed Development can be assured.
Landscape and Visual	
This application would dramatically alter the landscape surrounding the villages located directly nearby including Metheringham, Kirkby Green, Ashby de la Launde, Blankney, Bloxholm, Temple Bruer, Brauncewell, Rowston and Digby, as well as the wider community. The village of Scopwick would be virtually encircled by the application, as will some properties, which is causing great concern to local residents. There are several heritage assets within 5km of the site, including 11 Grade 1 listed buildings, 218 Grade 2 or 2* listed buildings, and 17 scheduled monuments including Brauncewell Medieval Village (located approximately 500m to the south of Springwell West).	The Landscape and Visual effects of the Proposed Development are assessed in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] which acknowledges that some significant effects on landscape character would occur. These effects would typically be confined to the landscape beyond the settlements identified and the character within the villages themselves would not be altered. As set out in the **Design Approach Document [EN010149/APP/7.3.2]**, Project Principle 1.2 seeks to achieve appropriate offsets to local settlements and dwellings on a case by-case basis whilst Project Principle 2.3 seeks to maintain the rural separation between the villages of Ashby de la Launde, RAF Digby, Scopwick, Kirkby Green and Blankney. As a result, there would be no significant effects during operation on views from the settlements of Scopwick, Metheringham, Kirkby Green, Ashby de la Launde, Blankney, Bloxholm, Temple Bruer, Brauncewell, Rowston and Digby. Solar PV development in Springwell East lies beyond several fields to the north east of Scopwick whilst the eastern edge of Solar PV development in Springwell Central also lies beyond several

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	more fields to the south of Scopwick. The Zone of Theoretical Visibility plans (ZTVs) presented in **ES Volume 2, Figure 10.6: Solar PV Detailed Screening ZTVs [EN010149/APP/6.2]** [APP-066] indicate that theoretical visibility of the Solar PV development extends up to Trundle Lane to the north of Scopwick and also demonstrates the absence of any visibility within the settlement itself. Site work has established that the belts of vegetation which surround this settlement, combined with multiple additional layers of intervening hedgerow, would screen any view of the Proposed Development from Scopwick. It has therefore been assessed that there would be no view of any element of the Proposed Development, during construction, operation and maintenance or during decommissioning from any location within this village. **ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3]** [APP-111] presents an appraisal of visual effects on isolated residential properties which lie outside of the main settlements and where significant effects on visual amenity may occur. In total, the residents of 25 dwellings would experience significant visual effects during year 1 but in most cases by year 10 these effects would reduce in magnitude due to the establishment of mitigation and by year 10 would be not significant. No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live. All designated heritage assets within 5 km of the site (including scheduled monuments, listed buildings and conservation areas) have been considered within **ES Volume 3, Appendix 9.1: Archaeological Desk- Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2]** [AS-014]. All those where significant effects were identified are discussed in detail within **ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1]** [AS-012]. This includes Brauncewell Medieval Village where a permissive path is proposed to enhance this asset. The assessment concluded that there would be no significant effect on designated heritage assets, including Brauncewell Medieval Village and the non-designated heritage assets. Non-significant effects on designated heritage assets have been further described within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] which details the level of harm to their significance Historic England have confirmed that they are in broad agreement with the findings of the assessment with regard to the designated cultural heritage assets, this agreement will be

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	detailed in the **Draft Statement of Common Ground with Historic England [EN010149/APP/8.3]** submitted at Deadline 1.
Military Interest	
Metheringham Airfield sits in the vicinity of this application. This site preserves the memory of all the men and women who flew with or supported 106 Squadron RAF Bomber Command at RAF Metheringham in WW2. At least 18 public footpaths, byways and bridleways lie within the boundaries of the site. These include four promoted walks which form part of the 'Stepping Out' series developed by North Kesteven District Council. They are the Shires and Steeples Trail, the Scopwick Loop, the Kirkby Green Loop and the Blankney Circuit. Springwell West is adjacent to the Bloxham Wood Nature Reserve, in the southeast corner of the site.	Public Rights of Way users have been considered within **ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010] and a variety of management measures, including a minimum set back distance from PV modules, additional planting to screen PRoWs and protection from construction activities, are secured through the **Outline Public Rights of Way and Permissive Paths Management Plan {oPROWPPMP) [EN010149/APP/7.12.2]**. Military heritage assets have been considered within **ES Volume 3, Appendix 9.1: Archaeological Desk- Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2]** [AS-014].
There are three local RAF bases within the vicinity of this application: RAF Digby, RAF Cranwell and RAF Waddington. This application is causing great concern regarding the glint and glare arising from such a large application. In particular, RAF Waddington is home to the Red Arrows who residents are familiar with practicing over the skies in this area. The Red Arrows do not fly in a linear direction. Pilots will often be inverted and flipped at high speeds, causing further concern for the glint and glare to pilots who are flying upside down over such a development. Moreover, as the email of 19th April 2023 from [Redacted] North Kesteven District Council notes, RAF Digby is the HQ of the Joint Cyber and Electromagnetic Activities Group. Any interference with these defence estates would cause significant	Glint and glare impacts upon military aerodromes and activity have been assessed within **ES Volume 3, Appendix 5.4: Glint and Glare Study [EN010149/APP/6.3.2]** which considers specific receptors defined by the Ministry of Defence including Air Traffic Control Towers, final approach paths and circuits as agreed through ongoing engagement in relation to glint and glare. The assessment concludes no significant impact is predicted upon aviation activity associated with the Ministry of Defence, which has been agreed in the **Draft Statement of Common Ground with the Ministry of Defence [EN010149/APP/8.7]** submitted at Deadline 1. The impacts of electromagnetic fields upon human health have been assessed within ES Volume 3, Appendix 5.5: High-Level Electromagnetic Field Assessment **[EN010149/APP/6.3]** [APP-079] which considers the proposed electrical infrastructure including underground cables, transformers and substations. The assessment concludes no significant impact is predicted due to levels of electromagnetic radiation from the underground cables predicted to be below ICNIRP (International Commission on the Non-Ionizing Radiation Protection) reference levels for magnetic and electric fields, and radiation from the transformers that form part of the Springwell Substation

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harm. On this basis, the application should not be recommended due to the potential interference with the RAF bases, local heritage, rural communities and sheer scale of such an application.	will be even less significant because the equipment will be housed in protective enclosures. The Applicant is in the process of agreeing an outline Electrical Noise Interference Management Plan with the Ministry of Defence and approval of a detailed plan is to be secured within the **Draft DCO [EN010149/APP/3.1.2].**
Principle of Development	
Energy Efficiency - Most large-scale solar systems (that have a capacity of at least 1 MW) in the UK are ground-mounted (94.5%; 1,145 systems). Only 5.5% (67 solar systems with a capacity of at least 1 MW) are installed on rooftops. Some 90% of respondents to my local Solar Farm Survey, which was sent to thousands of residents, said they would favour solar on industrial roofs. It is estimated that there are 600,000 acres of south-facing industrial roof space not currently used for solar in the United Kingdom. A push to prioritise industrial, brownfield and poor-quality land must be prioritised. By comparison, Hinkley Point C, under construction in Somerset, will produce 26TWh of electricity per year for 60 years. Hinkley Point C spans 430 acres in total, making it roughly one-tenth the size of Springwell, despite producing more than 25 times as much energy, for 20 years longer. Currently, 2,000 acres of solar panels are required to power around 50,000 homes, but one small modular reactor, requiring the space of just two football pitches, would power 1 million homes. Efficiency of solar panels and the requirement for sunlight means that output of the site will not be continuous, with concerns that estimated generation will only be for 16% of the time the site is operational. Economic viability of the site must be considered within the application.	The legal requirement to achieve net zero underpins the urgent need for the delivery of large capacities of stable and affordable electricity generation schemes that make the best use of Great Britain's natural low-carbon energy resources and available grid connection points. The critical national priority for nationally significant low-carbon infrastructure, the definition of which includes solar PV, is set out in paragraph 4.2.5 of EN-1. The urgent national need for energy-generating stations set out in both EN-1 and EN-3 is of great significance to the determination of the Proposed Development. In addition to the recognised need to deploy nationally significant low carbon CNP infrastructure, NPS EN-1 also recognises that the UK's energy security and Net Zero ambitions will "*only*" be delivered if we can enable the development of new low-carbon sources of energy at "*speed and scale*." Para 3.3.20 of EN-1 sets out government's conclusion that *"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar."* Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3. Section 6.6 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] describes the current status of operating and under-development nuclear assets in the UK, including the Small Modular Reactor competition currently being run by Great British Nuclear, with the aim of taking forward technologies which *"offer the greatest confidence in being able to make a final investment decision in 2029*" and be "*most able to deliver cutting-edge technology by [the] mid-2030s."* In the Clean

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	Power 2030 Action Plan government recognises the need to retain optionality in its pathway to Clean Power subject to (among other things) the progress made (or not made) by *"long lead-time*" assets - such as nuclear because their delivery and associated time-scales are not certain. The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010149/APP/7.2.2]** [AS-018] sets out the justification for the Proposed Development, including its size and location. The Proposed Development equates to an output of 1MW per 2.4 acres, representing an efficient use of the land for solar PV and associated infrastructure within the range identified in paragraph 2.10.17 of NPS EN-3.

Table 3-6: Digby Parish Council

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BESS	
The associated Battery Energy Storage Systems (BESS) planned with this proposed scheme are a great worry, particularly in light of the recent fire in January, in America, at a battery storage plant, which took over 15hours to control and emitted toxic fumes so the area needed to be evacuated. It is our understanding that currently the Fire Service Guidelines do not give definite instructions on how to deal with Lithium battery fires on the scale of units that are planned within the Springwell site. The area is rural and the amount of water needed	The Applicant has applied industry best practice to the design of the BESS (Battery Energy Storage System), including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems" and these measures are agreed with Lincolnshire Fire and Rescue Service in the **Draft Statement of Common Ground - Lincolnshire Fire and Rescue Service [EN010149/APP/7.24]** [APP-0157]. The Applicant is engaging with the UK Health Security Agency on the subject of thermal runaway and details can be found in the **Statement of Common Ground – UK Health Security Agency [EN010149/APP/8.6].**

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to control a fire at the location site will be far more that what is available. The local part time fire services would struggle to maintain a vertical water barrier to prevent the toxic smoke and fumes spreading to neighbouring villages, in some cases only 1mile away. The lithium can not be put out with water so it will burn for hours, possibly days Extract from a paper on - Safety of Grid Scale Lithium-ion Battery Energy Storage Systems. Li-ion batteries can fail by “thermal runaway” where overheating in a single faulty cell can propagate to neighbours with energy releases popularly known as “battery fires”. These are not strictly “fires” at all, requiring no oxygen to propagate. They are uncontrollable except by extravagant water cooling. They evolve toxic gases such as Hydrogen Fluoride (HF) and highly inflammable gases including Hydrogen (H2), Methane (CH4), Ethylene (C2H4) and Carbon Monoxide (CO). These in turn may cause further explosions or fires upon ignition. The chemical energy then released can be up to 20 times the stored electrochemical energy. The Parish Council does not want our residents’ lives to be in danger of toxic fumes or the risk of runaway fires. This again shows this is not the answer to this country’s power requirements.	The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the **Outline Battery Safety Management Plan (oBSMP) [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** These documents set out the very low likelihood of such an event (1 in 7700 years), an aggregate figure which accounts for all example BESS enclosures within the compound) along with the worst case impacts that could occur. The **BESS Plume Assessment [EN010149/APP/7.19.2]** demonstrates that should a thermal runaway event occur, it would not pose significant risks to nearby human health receptors, including the closest residential receptors to the proposed BESS compound (approx. 440m to the southeast). In the very unlikely event that harmful impacts could occur, harmful impacts are predicted to only occur within tens of metres rather than hundreds of metres from the specific BESS enclosure involved in any thermal runaway event. Due to the typical weather conditions at the Order Limits, the smoke plume would likely be less than 6m in width. Higher wind speeds typically disperse external flaming from a BESS enclosure, shortening flame length and diluting the resultant smoke plume ensuring fire emission impairment distances are reduced. It should also be noted that the modelled plume remained well formed and showed a gradual rise and dilution as it moved downwind, reducing the risk to people at ground level. The indicative design of the BESS enclosure and site layout follows guidance to lay assets out in a manner that limits the ability for a thermal runaway event to spread to adjacent enclosures or significantly impact the local community. Lincolnshire Fire and Rescue Service would respond to any BESS event according to a mutually agreed Emergency Response Plan secured in the **oBSMP [EN010149/APP/7.14.2]** which further reduces risk. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS Original Equipment Manufacturers advise that hose streams should not be directly discharged on BESS battery systems because this can significantly prolong a BESS failure event. A defensive tactic known as boundary cooling is used, which typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. This also ensures that water usage and environmental pollution risks are minimised. Generally, as demonstrated during a range of recent BESS full scale burn testing and real world incidents, total BESS burn out times would typically be defined as 5 to 10 hours for battery systems operating at a high state of charge. Burn out times can be longer, such as 12 hours,

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	where the length of the burn may be extended due to the BESS operating at a low state of charge when the thermal event occurred. As stipulated in the **oBSMP [EN010149/APP/7.14.2]** the BESS Compound would be designed to integrate fire hydrants with water delivered from static water tanks (a pump driven system) for firefighting, depending on available water supply and in accordance with NFCC Guidance. Water provision will be designated for the cooling of adjacent BESS and ancillary equipment. The **oBSMP [EN010149/APP/7.14.2]** and **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. They also set out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. The Applicant has engaged with Lincolnshire FRS throughout the pre-application period, with ongoing dialogue on suitable preventative measures and response to any thermal runaway event. Comments received from the Lincolnshire FRS have been incorporated into the design of the BESS compound, **oBSMP [EN010149/APP/7.14.2]** and the **BESS Plume Assessment [EN010149/APP/7.19.2].** Part of the mitigations discussed and agreed with Lincolnshire FRS relate to the potential need for water to cool adjacent enclosures in the event of a fire. If required, the BESS compound can accommodate sufficient water storage over and above the minimum currently required under NFCC guidance. Appropriate measures would be agreed with the Lincolnshire FRS during the detailed design stage.
Cumulatives	
It is understood each NSIP development is looked at individually but the bigger picture needs to be looked at. Currently there are 14 solar plant developments (known to us) at various stages of planning in the Lincolnshire/Nottinghamshire area, if all are approved, it will cover 34,441 acres, which is 53.81 square miles (139.37squre kilometres). Although this application is for 4200 acres there are also 2 other major applications for solar plants in extreme close proximity and they plan to flow all their power through the proposed Navenby Sub-	An assessment of inter-project cumulative effects has been undertaken and is presented in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].** This assessment considers existing development and/or approved developments within a 10km ‘search area’ from the Proposed Development. However, consideration has been afforded to the adoption of a wider county level study area for the cumulative assessment in relation to Best and Most Versatile Agricultural Land which considers other Solar NSIPs within Lincolnshire and within 1km of the border with Nottinghamshire. No significant inter-project cumulative effects have been identified. The solar and energy storage element of the Fosse Green Energy scheme is proposed to be located in the vale west of the Lincoln Cliff, in a different landscape character area (the Witham

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station and battery site. One is Foss Green for 2,400 acres and the other is Leoda for a further 2,400 acres. The industrialization of this part of Lincolnshire is a serious issue.	and Brant Vales) and therefore would have no visual connection with the Proposed Development. There would be no shared landscape or visual receptors. Although indicative grid connection corridor options extend to the A15 north of the Proposed Development, it is understood that this would be via an underground cable and therefore no significant landscape or visual effects are anticipated in combination with this project. The assessment acknowledges that some significant effects on landscape character would arise principally from a localised change and the introduction of new Solar PV development, Satellite Collector Compounds, BESS, Springwell Substation and ancillary infrastructure such as fencing and CCTV into fields which are currently in agricultural land use. The Solar PV development would, however, be underlain by grassland and mitigated by extensive new hedgerow and woodland planting as outlined in the **oLEMP [EN10149/APP/7.9.2].**
General – Impacts on residential amenity and property values	
The Parish Council are also concerned about the effects on house prices, some local estate agents have already seen that prices have dropped by 7% in areas where the plant is being proposed. Unfortunately, this country does not have vast areas of waste land and open spaces like the USA and Australia, where solar panel plants on this scale can easily be in-cooperated into the landscape with little effect on residents, so we should not copy them but develop a green power source more suited to our country. Lincolnshire, although rural, is the home and livelihood to thousands of people. This application and the several other solar plants also being applied for in this area, will greatly affect the local economy and the lives of the people in a negative way.	The Applicant has sought to limit impacts on properties close to the Proposed Development in accordance with the Project Principles set out in the **Design Approach Document [EN010149/APP/7.3.2].** This includes the provision of appropriate offsets to local settlements and dwellings on a case-by-case basis (Principle 1.2) and maintaining the rural separation between local villages (Principle 2.3). An appraisal of visual effects on residential properties close to the Proposed Development is presented in **ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3]** [APP-111]. In total, it has been assessed that the residents of 25 dwellings would experience significant visual effects during year 1. Still, in most cases, by year 10, these effects would reduce in magnitude due to the establishment of mitigation and by year 10, they would not be significant. No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. Following the

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	Phase Two Consultation, the Applicant refined the development boundary, removing 68 Category 1 and 2 persons and all 154 Category 3 persons initially identified. After diligent inquiry, the Applicant does not consider there to be any remaining Category 3 persons.
Land contamination	
If a fire occurs, the chemicals from the battery units mixed with the suppressants used to try and control a fire will leach into the aquifer. The aquifer in this area is one of the most important in the country. The possible contamination of this water source would be catastrophic. The proposed BESS at Navenby to serve Springwell will be one of the largest in the country, it is also sited near a high-pressured fuel line that serves the MOD airfields in the area. Any accidental fire in the BESS could become a major incident.	The potential for groundwater to be adversely impacted by the development has been considered in detail by the assessment that has been undertaken in **ES Volume 1, Chapter 11: Land, Soil and Groundwater[EN010149/APP/6.1.2]**. Mitigation measures secured by the **Outline Operational Environmental Management Plan (oOEMP) [EN010149/APP/7.10.2]** include measures to manage firewater associated with the BESS. Firewater will be collected on-site, therefore any contaminants present within this water would not be released to the environment, and would not be able to leach into the groundwater. The measures within the **oOEMP** and **oDEMP**, alongside the **oBSMP [EN010149/APP/7.14.2]** will ensure that during any incidents that occur relating to fires at the BESS, any runoff water will be contained and managed to prevent damage to the wider environment, including the groundwater. The design will incorporate sufficient storage volume for firewater to ensure that there is no accidental release to the wider environment. There is one high pressure fuel line falling within the Order Limits, which is operated by Exolum Pipeline System Ltd. Discussions with Exolum Pipeline System Ltd have informed the design of the Proposed Development and are detailed in the **Draft Statement of Common Ground - Exolum Pipeline System Ltd [EN010149/APP/7.25]** [APP-158]. The effect of the Proposed Development on the Exolum Pipeline System Ltd assets has been discussed and Protection Provisions are due to be agreed in order to adequately protect those assets.
Land use/food security	
As well as looking at producing power, we need to look at the bigger picture and protect our own food production security in this war-torn world. The power could still be produced on brown field sites and rooftops and would be	The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of BMV land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site**

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a more effective use of land. The Parish Council is not against Green Energy, but these solar plants, as they are not farms, are not the answer The loss of good farm land to these proposed solar plants, covering the same area as some cities, is not acceptable. This is very short sighted of the Government, as it not only effects our food production, but this loss of land also effects energy crops and animal feed crops currently in production. Farm land is deliberately being down grading so it qualifies for solar plant development, land that only months ago was good enough to supply food for this country.	**Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The Applicant has sought to reduce impacts on BMV land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. This has influenced both the initial site selection process and the subsequent design evolution of the Proposed Development. This includes retaining fields for arable production that comprise solely of Grade 1 or 2 land. It would not be possible to advance with this project without the use of some BMV land, and the Applicant has provided further justification for this, as referenced in Section 11.9 of **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** and within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.** In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible.

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	The Proposed Development will result in the temporary use of some higher grade (BMV) agricultural land for solar development, cabling, access tracks and green infrastructure, together with some permanent use for green infrastructure only. The amount of BMV agricultural land used has been minimised through the site selection and design development process as outlined in **ES Volume 1, Chapter 4: Reasonable Alternative Considered** [APP-044]; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely. As set out in the **Planning Statement [AS-018]** at paragraph 8.8.15 onwards, out of the 1280ha of land within the Order Limits, 231.7ha is BMV, which is proposed to be utilised for hard infrastructure, i.e. collector compounds, Springwell Substation, Solar PV development, and BESS. A further 77ha is proposed to be used for Green Infrastructure, with the remainder (232.5ha) required for the installation of cabling, which will be available for agricultural use once the cable has been installed. The area of BMV agricultural land, which will therefore be unable to be farmed while the development is in place (up to 40 years) therefore represents approximately 24% of the Order Limits. This increases to 42% if the area to be temporarily out of use while the cable is being laid is included.
The residents are very worried that the fertile soil will be destroyed because of possible chemical leakage from the solar panels being washed into the ground and lack of attention to the soil around the equipment for the duration of the solar plant. Then at the end of the life of the solar plant, if they are actually dismantled and returned to agricultural land, as promised in the application, the soil will be too poor to produce any crops and may be left with the classification of Brown Fields, which will then open all this land for further industrialization. The rural way of life will be lost for ever.	During the operational life of each solar panel, maintenance operations will ensure that no chemicals or heavy metals will be released from within the panels. Any damaged panels would be removed and replaced in accordance with the **oOEMP [EN010149/APP/7.10.2]**. Panels that are correctly maintained will not result in any release of chemicals or heavy metals to the environment. The impacts of the siting solar PV arrays upon land and soils will be minimal. Soil health and quality may be improved following several decades of continuous grassland, when compared to land remaining in intensive arable rotation. Following the removal of solar infrastructure and land restoration, as detailed in the **oSMP [EN010149/APP/7.11.2]**, land is expected to return to its original agricultural quality and levels of crop production.
Principle of development	
Digby Parish Council strongly objects to the application proposed to cover 4,200 acres of our surrounding rural	Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK

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countryside in glass and steel. The proposed industrialization of our rural area is not the answer to the Governments need to rush to achieve Net Zero. In the time it takes to build these huge sites on good agricultural farm land this form of power source could be outclassed by more efficient sources and we will be left with massive amounts of our country's good food producing land smothered in glass and steel.	Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*"
Brownfield sites and roof tops need to be looked at rather than destroying miles and miles of good farm land. We know this will not please the power companies, or the Government as it will slow down the proposed Net Zero target, but the long-term protection of our lives, livelihoods, wildlife habitats and British farmland rather than the Governments knee jerk reaction to a situation should be a priority. The application for the Springwell Solar Farm (plant) should be refused.	Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3. The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts as detailed in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]. The proposed development is expected to require 2.4 acres for each megawatt (MW) of output, representing an efficient use of land for solar photovoltaic (PV) and associated infrastructure within the range identified in paragraph 2.10.17 of NPS EN-3. Appendix 3 Policy Compliance Assessment Tables of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] provide detailed evidence of compliance with relevant national and local policy documents and a comprehensive assessment.
Socio-economics	
The area of Lincolnshire that Springwell Energyfarm Ltd are proposing to industrialize is our home. The disruption to the way of life and the loss of open rural countryside, will affect the mental health of our residents, it will affect their livelihoods and the economy	**Mental Health and Wellbeing** The Applicant recognises that changes to the visual environment can impact upon mental health and wellbeing of residents. It is also acknowledged that assigning an effect on personal perception of the landscape and its mental health and wellbeing value is dependent on subjective

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of our county. Having vast areas of countryside being industrialized with glass, steel and concrete will drastically reduce tourism as no one will want to visit and walk around fields and fields of glass and steel. Local farmers, residents and public house landlords in the small villages that have had to diversify to survive, will lose the customers that their Airbnb's and restaurants have managed to attract.	interpretation of the landscape as a whole and of individual views by an individual and collective set of receptors. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] considers the impacts on residential amenity and the users of Public Rights of Way (PRoW), in addition to assessing visual impacts and considering how the project might alter views for nearby residents. The assessment concludes that significant major and moderate adverse visual effects are likely to occur during the construction, operational (years 1 and 10) and decommissioning for users of PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary. While these changes cannot be fully mitigated to reduce all residual effects, the design includes embedded screening measures to reduce visibility where possible, while additional mitigation measures include the adoption of the **Outline Construction Environmental Management Plan (oCEMP) [EN010149/APP/7.7.2]**, **oLEMP [EN10149/APP/7.9.2], Outline Landscape and Ecology Management Plan** [APP-0142], **oSMP [EN010149/APP/7.11.2]** and the **oDEMP [EN010149/APP/7.13.2].** Changes to visual amenity on PRoW will be mitigated against in the form of new hedgerow planting or structural planting belts where impacts are expected to be significant, which will result in these impacts becoming insignificant by the tenth year of operation. The Applicant also recognises that there is a substantial number of Relevant Representations from members of the public, Parish Councils and local opposition groups that cite concern about physical and mental health and wellbeing, related to a wider range of factors. The Applicant is content that receptors and health pathways, and individual environmental effects related to health and wellbeing have been appropriately considered, assessed and mitigated for (where practicable) as per the approach agreed at EIA Scoping. However, given the number of representations (noting that mental health can be affected by the clear provision and articulation of information), the position of key stakeholders and the fact that the approach to consideration of health and wellbeing is split across a number of different ES

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chapters, Management Plans and other documents (such as the **Equality Impact Assessment [EN010149/APP/7.18]** [APP-0151]), the Applicant considers that it would be beneficial to provide a comprehensive document that consolidates these elements in one place to demonstrate the consideration of health pathways through the submission a **Health and Wellbeing Summary Statement [EN010149/APP/8.10]** at Deadline 1.

Effects on Tourism

NPS EN-1 states that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts and that *"Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES… which may include effects on tourism"* (paragraph 5.13.2-6). It also sets out that *"The Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)"* (paragraph 5.13.10).

As such, the Government's national planning policy dictates that any potential effects on tourism should be evidence-based and therefore draw upon secondary data sources including public data, local/regional published assessments, and literature review, as well as a summary of reported likely significant effects across the range of environmental topic areas that may contribute to visitor amenity or the operation of existing tourist sector businesses and facilities.

A number of representations make reference to concerns about the Proposed Development's impact on the local tourism / visitor economy. This is specifically in reference to concerns about:

- Changes to the natural environment resulting in fewer visitors, and a reduction in Gross Value Added;
- Effects on specific (accommodation) businesses reliant on tourism;
- Effects on heritage assets; and
- Effects on PRoW.

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	As set out in the Scoping Report, the Applicant has recognised that there is the potential for effects relating to tourism resulting from amenity impacts such as visual impacts and impacts to PRoW during all phases of the Proposed Development. **ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2]** provides an assessment of likely significant effects on tourism, setting out (paragraphs 13.5.43 to 13.5.50) the overall scale and volume of the tourist economy within Lincolnshire and North Kesteven, and identifying the primary tourist sector strengths and specific assets which may be affected by environmental change related to the Proposed Development. This notes that the Stepping Out network appears to be of particular significance to the tourist economy and is heavily endorsed by the North Kesteven tourism office, and that the RAF Digby site is located adjacent to the Order Limits, which is a popular tourist attraction associated with the aviation heritage of North Kesteven. However, the majority of tourist receptors are beyond the area within which they would experience effects from environmental change reported in ES Volume 1, and therefore impacts to amenity or access to/from these receptors during operation (including maintenance) and construction is likely to be minimal. As stated in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] there is extremely limited theoretical visibility of the Proposed Development beyond 3km – as such, the assessment of effects on tourism are also considered across North Kesteven with a focus on effects to tourism receptors within a 3km radius of the Order Limits. The assessment at **ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2]** considers that the construction phase may have effects on the tourist economy as a result of impacts to visitor experience and behaviours, and linked impacts to tourism business receptor performance, resulting from visual and noise construction effects – the environmental effects from other assessments on tourist receptors are summarised from paragraph 13.7.20 to 13.7.27. With regard to users of PRoW, detailed management measures will be subject to agreement with relevant officers within the relevant planning authorities which will be detailed in a PRoW and Permissive Path Management Plan (PRoWPPMP) prior to the commencement of construction

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works, which is secured in the **Draft DCO [EN010149/APP/3.1.2]**. Any works near to the Spires and Steeples trail and all other PRoW within the Order Limits will be undertaken in line with the **oPRoWPPMP [EN010149/APP/7.12.2].**

It is also noted that the increased level of occupancy that may result from temporary construction workforce will likely mean that accommodation providers see an increase in revenue compared to previous years i.e. without such an increase in people wanting to stay in the area. Workforce staff would likely want to stay overnight throughout all times of year and therefore may provide more income during months that would normally see less occupants wanting to stay. Thus, increases in the level of occupancy can be a beneficial effect for businesses.

It is noted that no noise effects are identified as being significant within the EIA, though there would be changes to the visual environment as experienced from tourism receptors. During the construction and operational phases:

- There would be no significant effects to Royal Air Force (RAF) Digby as the nearest above ground infrastructure would be located approximately 1km to the south-west of the receptor. Therefore, glimpses of the Proposed Development would be distant and viewed through the security fencing which surrounds RAF Digby. As there are no visual effects, it can be concluded that there will be no effects to tourism as a result of impacts to visual amenity at RAF Digby.
- Significant visual effects from PRoW and the Stepping Out Network may adversely impact the number of visitors to the area. The Stepping Out Network is heavily utilised by visitors in the area, encourages active lifestyles and the use of the countryside for tourist purposes. Visual impacts may detract from the visitor experience of the countryside and thus reduce the number of tourists to the study area. However, the Stepping Out Network has been designed to link various routes across North Kesteven and therefore, the networks surrounding the Order Limits may experience a reduction in visitor numbers, but the Stepping Out Network more widely will not be impacted. 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 likely not be impacted.

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	The Applicant considers that effects on tourist sector receptors and tourism more generally have been considered and are unlikely to be significant overall, noting the scale of the tourist economy and the localised nature of environmental change, the sensitivity of receptors, and the availability of alternatives (with regard to PRoW). The Applicant will undertake good practice measures to avoid or minimise environmental disruption relating to construction activities and operation, and has worked to produce a plan to manage public access across the PRoW and permissive path network, alongside committing to enhancements to the network and creating new PRoWs in the operational phase to promote accessibility across the area and improve the overall network with new routes. These measures are secured in the **oPRoWPPMP [EN010149/APP/7.12.2]**.

Table 3-7: Dunston Parish Council

Summary Position of Interested Party Dunston Parish Council [RR-120]	Applicant Response
Principle of development	
The Council at its monthly meeting on Monday 10th October agreed to register its concern at the increasing number of applications being pursued to take over prime agriculture land in Lincolnshire for the use of solar panels. Whilst supporting the need for renewable sources of energy we also need to ensure that we do not sacrifice prime agriculture land in the process. There exist alternatives, such as roof space on many industrial/ agricultural buildings, which should be utilised as well as clear directives from the government for all new developments to be powered by renewable energy. It is clear that there the views of local communities are being ignored in the process of achieving government targets.	The Applicant notes the registered concern and welcomes the support for the need for renewable sources of energy. Government National Policy Statements are the starting point for consideration and determination of Nationally Significant Infrastructure Projects (NSIP) and in relation to large scale solar energy infrastructure these are Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Renewable Energy Infrastructure (EN-3). Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph

Summary Position of Interested Party Dunston Parish Council [RR-120]	Applicant Response
	3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*" Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3. The amount of BMV agricultural land used has been minimised through the site selection and design development process as outlined in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** [APP-044]; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely. Section 6 of the **Design Approach Document [EN010149/APP/7.3.2]** explains in greater detail how design measures were incorporated and changes were made during design development in relation to each of the Project Principles. It explains that the Applicant discounted all fields comprising solely Grade 1 or Grade 2 agricultural land from the proposed built development.

Table 3-8: Forestry Commission

Summary Position of Interested Party Forestry Commission [**RR-131**]	Applicant Response
Impacts on Ancient Woodland and veteran trees	
Thank you for consulting the Forestry Commission on this application. As a Non-Ministerial Government Department, the Forestry Commission provides no opinion supporting or objecting to an application. Rather, we provide advice on the potential impact that the proposed development could have on trees and woodland, including ancient woodland. We can confirm there are no ancient woodlands either within the site or adjacent to it. We note that all but one veteran tree has been avoided. Ancient and veteran trees are irreplaceable habitats.	**ES Volume 3, Appendix 7.12: Arboricultural Impact Assessment [EN010149/APP/6.3]** [APP-093] indicates that there is a single veteran tree within the Order Limits, however it is over 250m from any development proposals and will therefore not be directly affected. All trees within or adjacent to the Order Limits would be considered with appropriate stand-off distances and root protection zones as detailed in **ES Volume 3, Appendix 7.12: Arboricultural Impact Assessment [EN010149/APP/6.3]** [APP-093]. Mitigation measures to protect trees are detailed in the **oCEMP [EN010149/APP/7.7.2]** and **oLEMP [EN010149/APP/7.9.2]**.
There is also some mixed deciduous woodland within the site and some directly adjacent to it. These woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England). They were recognized under the UK Biodiversity Action Plan as habitats requiring conservation action. Though this plan has been superseded, their priority status remains under the Natural Environment & Rural Communities Act 2006 (NERC): Sect 40 (Duty to conserve and enhance biodiversity) and Sect 41 (List of habitats and species of principal importance in England).We note plans include the retention of all woodlands on-site and for retained trees and woodlands to have suitable buffers, with their root protection areas being avoided and suitably fenced and protected.	Woodland and trees within or adjacent to the Order Limits would be considered with appropriate buffer distances and root protection zones as detailed in **ES Volume 3, Appendix 7.12: Arboricultural Impact Assessment [EN010149/APP/6.3]** [APP-093]. Mitigation measures to protect trees are detailed in the **oCEMP [EN010149/APP/7.7.2]** and **oLEMP [EN010149/APP/7.9.2]**.
Habitat Management	

Summary Position of Interested Party Forestry Commission [**RR-131**]	Applicant Response
For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times the diameter of the tree. If this calculation results in an area smaller than 5m from the canopy edge, the buffer should default to 5m from the edge to ensure a minimum root protection area. We also note that 16ha of new woodland planting will be created on-site. It is important that woodland creation is not just used for screening at strategic locations but ensures habitat connectivity across the landscape. Particularly in areas adjacent to existing woodland, planting should support biodiversity and resilience. Ideally, woodland creation should be carried out in 5ha blocks or should connect existing woodlands to form blocks of at least 5ha.The species and provenance of new trees need to be carefully considered to create a resilient treescape capable of adapting to climate change. Biosecurity of all planting stock is also essential to prevent the introduction of pests and diseases, especially near ancient woodlands.	**ES Volume 3, Appendix 7.12: Arboricultural Impact Assessment [EN010149/APP/6.3]** [APP-093] indicates that there is a single veteran tree within the Order Limits, however it is over 250m from any development proposals and will therefore not be directly affected. No other ancient or veteran trees have been identified within the Order Limits. There will be a minimum 15m offset from the built development to existing woodland, as detailed in the **Design Commitments [EN010149/APP/7.4]** [APP-0138]. Maintaining a 15m buffer would protect tree root zones, as per Government standing advice. The **oCEMP [EN010149/APP/7.7.2]**, **oOEMP [EN010149/APP/7.10.2]** and **oDEMP [EN010149/APP/7.13.2]** secure measures to protect woodland from habitat degradation. The **oLEMP [EN10149/APP/7.9.2]** sets out the proposed new woodland planting specifying that tree species chosen will be resilient to climate change as far as is possible and will include appropriate biosecurity measures. Where possible new planting will be in blocks 5ha or above or connecting existing woodland. New woodland and hedgerow planting is proposed in strategic areas to enhance connectivity to support biodiversity and resilience as well as for screening and landscape purposes.
Plans should be in place for the long-term management and maintenance of woodlands, including deer and squirrel control. A UK Forestry Standard-compliant management plan may be beneficial, ensuring continued access for future maintenance. We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.	The Applicant can confirm that the **oLEMP [EN10149/APP/7.9.2]** sets out the proposed new woodland planting and that any new planting that will be managed and maintained for the operational life of Springwell Solar Farm, including tree guards to ensure adequate protection against deer and squirrel damage until new planting is sufficiently established.

Table 3-9: Metheringham Parish Council

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
BESS	
We note there are three BESS installations proposed on the Lincoln Heath, one associated with Springwell. These lithium battery storage facilities are susceptible to catching fire due to overheating. A lithium fire cannot be put out as it will burn underwater by self-generating oxygen. We believe that the copious amounts of water used in the event of a fire to contain its spread will dilute lithium chloride and other chemicals, which will also leach into the aquifer. Unless all BESS installations are properly bonded—which is currently not planned—this poses a serious risk.	The Applicant has applied industry best practice to the design of the BESS (Battery Energy Storage System), including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems" and these measures are agreed with Lincolnshire Fire and Rescue Service in the **Draft Statement of Common Ground - Lincolnshire Fire and Rescue Service [EN010149/APP/7.24]** [APP-0157]. The Applicant is engaging with the UK Health Security Agency on the subject of thermal runaway and details can be found in the **Statement of Common Ground – UK Health Security Agency [EN010149/APP/8.6].** The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the **Outline Battery Safety Management Plan (oBSMP) [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** These documents set out the very low likelihood of such an event (1 in 7700 years), an aggregate figure which accounts for all example BESS enclosures within the compound) along with the worst case impacts that could occur. The indicative design of the BESS enclosure and site layout follows guidance to lay assets out in a manner that limits the ability for a thermal runaway event to spread to adjacent enclosures or significantly impact the local community. Lincolnshire Fire and Rescue Service would respond to any BESS event according to a mutually agreed Emergency Response Plan secured in the **oBSMP [EN010149/APP/7.14.2]** which further reduces risk. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS Original Equipment Manufacturers advise that hose streams should not be directly discharged on BESS battery systems because this can significantly prolong a BESS failure event. A defensive tactic known as boundary cooling is used, which typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. This also ensures that water usage and environmental pollution risks are minimised.

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
	The **oBSMP [EN010149/APP/7.14.2]** and **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. If required, the BESS compound can accommodate water storage over and above the minimum currently required under NFCC guidance; the drainage system would be designed to fully capture external firefighting water, where the stored water would be tested before release or, if necessary, removed by tanker and treated offsite. If the captured firefighting water is deemed suitable, it can be reused by firefighters if additional water supplies are required for continued boundary cooling. Boundary cooling discharges water at equipment external surfaces and does not come into contact with battery systems, meaning there are minimal pollution risks.
Biodiversity	
This proposal will also have a negative effect on local wildlife and ecosystems, as it will disrupt the natural habitat of wildlife. The panels can kill insects and other small creatures as a result of solar radiation. Migrating wading birds have been known to crash into the panels, especially at night, thinking that the shimmering glare is water.	The impact on biodiversity is assessed in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]**. Due to the embedded design and mitigation proposals no significant residual adverse effects on biodiversity are anticipated. **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095] provides indicative figures substantially above the minimum 10% BNG commitment, demonstrating that the Applicant is expecting to deliver in excess of the minimum. The habitat condition criteria that must be reached to deliver the gain in biodiversity is set out within **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095] and will form the basis of post construction monitoring ensuring that the predicted uplift is delivered. This is secured by the **oLEMP [EN10149/APP/7.9.2]**. **Aquatic invertebrates** The limited research available in relation to solar farms and aquatic invertebrates suggests there may be an attraction from solar PV modules to aquatic invertebrates due to the reflection of polarised light. However modern solar PV modules, such as will be used at Springwell are designed to absorb as much light as possible and are typically coated with an anti-reflective film to help reduce this type of potential effect**.**

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
	ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2] outlines the survey work and assessment carried out to inform the Proposed Development, and no extensive aquatic habitats likely to support a diverse assemblage of aquatic insects were identified on Site and no designated sites identified for their aquatic invertebrates are located in close proximity to the Proposed Development. In addition, 6m buffers would be maintained from existing watercourses and an appropriate buffer from the ponds present to help reduce any such effect, as secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138]**.** No significant impacts on aquatic invertebrates were identified in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2].** **Wading birds and other birds** Collision with infrastructure on solar farms has been reported as a cause of mortality in birds, including endangered species (Penniman & Duffy, 2021), although the frequency of such incidents varies amongst sites (e.g. Kagan et al., 2014; Visser et al., 2019; Kosciuth et al., 2020), with one UK study finding no evidence of bird mortalities from solar panels (Feltwell, 2013). Some concern has been expressed that birds might collide with solar panels if they were to mistake them for waterbodies, a phenomenon sometimes referred to as the 'lake effect' (Kagan et al., 2014). It might be expected that such an effect would pose the greatest risk to migratory waterbirds and although a relatively high proportion of 'water-dependent' species were amongst the collision fatalities recorded at one large solar installation (Kagan et al., 2014) there is no evidence to directly support the 'lake effect' (Kosciuch et al., 2020). An evidence review of the impact of solar farms on birds in the UK suggests that the collision risk presented by Solar PV Modules to birds is low (*Hanson et al 2017*). **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** has not identified any significant impacts in relation to wading birds. Surveys carried out within the Order Limits and surrounding area show that there are not significant numbers of wading birds using the Site, nor does the Proposed Development sit on a migratory route or flight path between wetland sites. Details of breeding and wintering bird surveys undertaken are provided in **ES Volume 3, Appendix 7.2: Breeding Bird Survey [EN10149/APP/6.3]** [APP-083] and **ES Volume 3, Appendix 7.3: Wintering Bird Survey [EN10149/APP/6.3]** [APP-084] respectively. Monitoring is proposed of the bird populations within the Order Limits throughout the operational phase in response to the Proposed Development and biodiversity enhancement provided, which will add to the evidence

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
	research base. The results of this monitoring will be reported back to the local planning authority. The monitoring, alongside habitat creation and management through construction and operation, is secured through a commitment in the **oLEMP [EN010149/APP/7.9.2].**
Flood	
When these large solar arrays are erected, they will deprive 75% of the land from sunlight. Rainwater will be directed into rivulets that will form between the panels. Laying this land into an unnatural fallow state for 40 years could have such a detrimental effect that it may not be able to be remediated to its original state. Only time will tell, because this is an experiment—it has not been done before on this scale in this country.	Any precipitation falling on each solar panel will runoff the panels and flow towards / infiltrate in the rain shadow of the down-slope modules. Runoff from solar panels could result in the kinetic compaction of soils at the base of the panels and the intensification of runoff into rivulets running along the trailing edge of the rows of panels. This could conceivably lead to a slight increase in the amount of runoff when compared to the pre-development situation resulting from a decrease in infiltration potential. Sustainable management of the post development situation in terms of vegetation planting and soil type can be used as a means of managing surface water runoff from the solar panels and is secured in the **oLEMP [EN10149/APP/7.9.2]**. As such, to ensure that there is no increase in surface water runoff, managed sustainable vegetation (with a good soil structure e.g. chisel ploughed soils) will be allowed to grow beneath the solar panels, which will avoid kinetic compaction and ensure that any potential instances of rivulet formation are minimised, and surface water runoff flows over the ground in a natural way. The land will not be in an unnatural fallow state for 40 years as it will be in managed permanent grassland and the quality of land and soil retained during the lifetime of the project in accordance with the **oSMP [EN010149/APP/7.11.2]**.
General	
This Parish Council objects to the application as submitted and believes that the proposed application does not conform with the following government planning policies: NPPF paragraphs 183 and 187, NPS EN-1, and NPS EN-3.	The **Planning Statement [EN010149/APP/7.2.2]** [AS-018] outlines how the Proposed Development complies with national and local planning policy. Section 6 of the Planning Statement sets out the legislative context, including the relationship between the Planning Act 2008, relevant NPSs and the Proposed Development. Sections 6.3 and 6.4 set out the national policies against which the Proposed Development will be determined and other local and national policies that may be important and relevant matters for the SoS's decision, which may include the NPPF. Whilst not the primary policy for the determination of NSIPs, the NPPF has been assessed in the Planning Policy—Table of Compliance, Table 4, which can be found in **Appendix 3** of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.**

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
	The substantial benefits and need for the Proposed Development as set out in Section 3 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018], including the delivery of CNP infrastructure to contribute towards meeting national energy objectives, outweighs the residual landscape effects when applying the planning balancing exercise to the Proposed Development with no requirement to demonstrate exceptional circumstances given that the presumption for allowing the DCO.
Land contamination	
We are also concerned regarding the pollution of the Lincolnshire limestone aquifer, which lies some 20m below the surface of the affected land. PV panels contain many carcinogenic materials such as lead, cadmium, and silver. If the panels begin to delaminate over time, these heavy metals mixed with acid rain will not only contaminate the soil but also percolate down into the aquifer.	The potential for groundwater, including the Lincolnshire limestone aquifer, to be adversely impacted by the development has been considered in detail by the assessment in **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]**. This considered the current baseline sensitivity of the groundwater, and then identified works during construction, operation or decommissioning that could cause pollution to occur. Mitigation measures to prevent pollution are included in the management plans as detailed below. For the site, the groundwater receptors are assigned high sensitivity in some areas (where there is a principal aquifer and a groundwater source protection zone), and in other locations the groundwater sensitivity is medium or low. Due to the robust mitigation measures that are included in the management plans for all three phases of the Proposed Development, the potential impact on groundwater when mitigation measures are in place is assigned a significance of low adverse. This means that the residual effect on the groundwater receptors (of all sensitivity levels) is not expected to be significant due to the measures that will be in place to protect the receptor. Proposed mitigation measures, that will be secured by the **oCEMP [EN010149/APP/7.7.2], oOEMP [EN010149/APP/7.10.2]**, and **oDEMP [EN010149/APP/7.13.2]** include: • completing site investigation work to assess if there is any existing contamination on-site that requires remediation; • measures to prevent disturbance of existing contamination; • emergency procedures to manage accidental spillages and leaks in order to minimise any risk to the soil and groundwater; • completing a piling risk assessment to ensure that potential impacts to groundwater are identified and minimised; and

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
	• measures to manage firewater associated with the BESS. Firewater will be collected on-site, as secured by the **oOEMP [EN010149/APP/7.10.2]**. Therefore any contaminants present within this water would not be released to the environment, and would not be able to leach into the groundwater. Run-off from construction areas will be managed during works by the **oCEMP [EN010149/APP/7.7.2]**, and will not be released directly to the soil/groundwater. This will ensure that there is no accidental release of contaminants from working areas into the wider environment. Any run-off from solar panels will be a result of rainwater only, so this can be safely released to the underlying soil without any adverse impacts on soil or groundwater. During the operational life of each solar panel, maintenance operations will ensure that no chemicals or heavy metals will be released from within the panels. Any damaged panels would be removed and replaced in accordance with the **oOEMP [EN010149/APP/7.10.2]**. Panels that are correctly maintained will not result in any release of chemicals or heavy metals to the environment.
Land use	
While Metheringham Parish Council supports the production of green energy, we do, however, have significant concerns about the proposed Springwell Solar Farm development, which abuts the southern parish boundary. While the proposal is not being actually constructed within this settlement, it will have an adverse effect on our residents and visitors to the parish. The proposal covers approximately 1,400 ha of prime agricultural land, on and adjacent to the Lincoln Heath. The loss of this vital food production is a significant issue considering the country only produces 60% of the food it consumes. All of the land within the proposal has the benefit of a crop irrigation system. The concerned land is classified as best and most versatile, Grades 2, 3a with	Policy in NPS EN-1 and NPS EN-3 recognises that solar development may take place on agricultural land, but that applicant's should not site their scheme on Best and Most Versatile (BMV) agricultural land without justification and, where demonstrated to be necessary, that the poorer quality land should be preferred over higher quality. National policy in NPS EN-1 and NPS EN-3 as set out in the Planning Statement distinguishes between the use of BMV (Grades 1, 2 and 3a) and non-BMV (3b and 4). While 3b may still be farmable, it is not considered by policy to be of sufficient quality to be defined as BMV agricultural land. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
some 3B. When there are other indifferent lands available, together with some 240,000 ha of industrial roofs that have not got panels fixed to them, it seems a dreadful waste of good agricultural land.	a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of Best and Most Versatile (BMV) land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm. In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. The Proposed Development will result in the temporary use of some higher grade (BMV) agricultural land for solar development, cabling, access tracks and green infrastructure, together with some permanent use for green infrastructure only. The amount of BMV agricultural land used has been minimised through the site selection and design development process as outlined in **ES Volume 1, Chapter 4: Reasonable Alternative Considered** [APP-044]; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely. As set out in the **Planning Statement [AS-018]** at paragraph 8.8.15 onwards, out of the 1280ha of land within the Order Limits, 231.7ha is BMV, which is proposed to be utilised for hard infrastructure, i.e. collector compounds, Springwell Substation, Solar PV development, and BESS.

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	A further 77ha is proposed to be used for Green Infrastructure, with the remainder (232.5ha) required for the installation of cabling, which will be available for agricultural use once the cable has been installed. The area of BMV agricultural land, which will therefore be unable to be farmed while the development is in place (up to 40 years) therefore represents approximately 24% of the Order Limits. This increases to 42% if the area to be temporarily out of use while the cable is being laid is included. Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*" Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3.
Landscape and visual impacts	
The visual impact of a large solar array such as is planned will have a detrimental effect on the vista across the Lincoln Heath. Such a concentration of panels will be off-putting not only to visitors from the south of England but also to potential property buyers.	The Applicant has developed the design of the Proposed Development to provide a sensitive response to the local environment and reduce potential impacts in accordance with the Project Principles set out in the **Design Approach Document [EN010149/APP/7.3.2]**. This includes designing the Proposed Development to respond to the distinctive and unique local character of the site (Principle 2.2) and consideration of sequential views and people using local roads and footpaths (Principle 1.3 and 5.3). A full list of Project Principles is provided in the **Design**

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
	Approach Document [EN010149/APP/7.3.2] together with an explanation of how they have guided decision making and informed the Proposed Design. Mitigation in the form of landscape planting has been proposed to mitigate visual impacts, which are detailed and secured in the **oLEMP [EN10149/APP/7.9.2]**. A vista usually describes a recognised and focussed view (e.g. along an avenue of trees or buildings) which often includes a focal point terminating the view. The Limestone Heath is a wide open landscape and contains no such vistas or focal points. However, assuming that this comment is a broader observation regarding the general visibility of the Solar PV development across the heath, **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] acknowledges that some significant effects on visual amenity would occur, including on views from the A15 both during construction and operation. Mitigation measures have been proposed to minimise these effects as appropriate. However, the A15 is a trunk road and not a tourist destination for visitors. Some significant visual effects are also reported either during construction or in year 1 of operation from minor roads to Temple Bruer and Thompsons Bottom Farm and from part of the B1191 (Heath Road). Again these are not recorded as visitor attractions. Elsewhere across the heath, Public Rights of Way are relatively sparse and are not particularly well connected. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] reports that there would not be any significant effects on the Ridges and Furrows Way or the Viking Way/High Dike as they pass across the heath. The same chapter acknowledges that there would be a significant visual effect on a network of PRoWs and lanes north-west of the Proposed Development, between the A15 and Wellingore Heath including New England Lane and Gorse Hill Lane. However, by year 10 once mitigation planting has established, this effect would be not significant. The Applicant has sought to limit impacts on properties close to the Proposed Development. More information about how the Proposed Development has been designed to limit visual effects can be found in the **Design Approach Document [EN010149/APP/7.3.2]** and an appraisal of visual effects on residential properties close to the Proposed Development is presented in **ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3]** [APP-111]. In total across the project as a whole, it has been assessed that the residents of 25 dwellings would

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
	experience significant visual effects during year 1 but in most cases by year 10 these effects would reduce in magnitude due to the establishment of mitigation and by year 10 would be not significant. No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live. As a result of the design changes that have been incorporated into the Proposed Development **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] concludes that the development would not impact the character of local villages and would not be visible from any locations within them except for potentially glimpsed views from RAF Digby. Along the B1191 (Heath Road) and B1181 (Lincoln Road) Solar PV development would generally be set well back or screened by existing vegetation and new planting. Along local footpaths, offsets and new hedgerows would help to screen and integrate the Proposed Development with the rural landscape. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. Following the Phase Two Consultation, the Applicant refined the development boundary, removing 68 Category 1 and 2 persons and all 154 Category 3 persons initially identified. After diligent inquiry, the Applicant does not consider there to be any remaining Category 3 persons. However, should any parties consider that their property has decreased in value as a direct result of the physical impacts from the operation of the Proposed Development, such as noise and vibration, they may be eligible to claim for compensation under Part 1 of the Land Compensation Act 1973.
Noise and light pollution	
Noise and light pollution is another detrimental feature of these solar farms that not only affects wildlife but also people who live near and travel by them.	An assessment of noise effects from the construction and operational phases is provided in **ES Volume 1, Chapter 12: Noise and Vibration [EN010149/APP/6.1]** [APP-052]. The assessment concludes that the effects from noise during both phases is not significant following adoption of the mitigation measures as outlined in the **Design Commitments [EN010149/APP/7.4]** [APP-0138] and Section 3 of the **oCEMP [EN010149/APP/7.7.2]**.

Summary Position of Interested Party Metheringham Parish Council [RR-264]	Applicant Response
	The lighting design would limit impact on sensitive receptors by directing lighting away from the Order Limit boundaries and existing vegetation. During operation (including maintenance), no part of the Proposed Development would be continuously lit; manually operated and motion detection lighting would be utilised for operational and security purposes. This is secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138]**.** The **oLEMP [EN10149/APP/7.9.2]** outlines that the lighting strategy will follow guidance issued by the Bat Conservation Trust to reduce illumination of grassland and other habitats to minimise the impacts of lighting on foraging bats. It is considered that this will also minimise impacts on lepidoptera species.
Traffic and transport	
During the construction phase, the amount of traffic that will be prevalent on our already overloaded road system, both locally in our parish and generally around the district, will cause an enormous amount of congestion and issues.	**ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010] **and ES Volume 3, Appendix 14.1: Transport Assessment [EN010149/APP/6.3]** [APP-123] set out the potential for traffic impact. Suitable mitigation measures are outlined in the **oCTMP [EN010149/APP/7.8.2].** The increase in traffic on the B1191 in Metherington is 3% during the peak of construction and well below the 10% threshold for undertaking a traffic assessment. The assessment considers the wider road network and reports the impact figure for other roads in **Table 14.23** of **ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010]. Suitable mitigation measures for the road network that construction traffic uses are outlined in the **oCTMP [EN010149/APP/7.8.2]**. Measures detailed in the oCTMP include setting approved access routes for HGV traffic, road signage strategy, a Staff Travel Plan, Community Liaison Group / Traffic Management Working Group, monitoring of the traffic management measures and effective enforcement measures. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures outlined in the Construction Traffic Management Plan.

Table 3-10: Nocton Parish Council

Summary Position of Interested Party Nocton Parish Council [RR-304]	Applicant Response
BESS	
We note there are three BESS installations proposed on the Lincoln Heath, one associated with Springwell. These lithium battery storage facilities are susceptible to catching fire due to overheating. A lithium fire is unable to be put out as it will burn underwater by self-generating oxygen. We believe that copious amounts of water that are used in the event of a fire—to contain its spread and have a dousing effect—will also leach lithium chloride and other chemicals into the aquifer, unless all BESS installations are properly bonded. However, at this time, it is not planned to do so.	The Applicant has applied industry best practice to the design of the BESS (Battery Energy Storage System), including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems" and these measures are agreed with Lincolnshire Fire and Rescue Service in the **Draft Statement of Common Ground - Lincolnshire Fire and Rescue Service [EN010149/APP/7.24]** [APP-0157]. The Applicant is engaging with the UK Health Security Agency on the subject of thermal runaway and details can be found in the **Statement of Common Ground – UK Health Security Agency [EN010149/APP/8.6].** The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the **Outline Battery Safety Management Plan (oBSMP) [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** These documents set out the very low likelihood of such an event (1 in 7700 years), an aggregate figure which accounts for all example BESS enclosures within the compound) along with the worst case impacts that could occur. The indicative design of the BESS enclosure and site layout follows guidance to lay assets out in a manner that limits the ability for a thermal runaway event to spread to adjacent enclosures or significantly impact the local community. Lincolnshire Fire and Rescue Service would respond to any BESS event according to a mutually agreed Emergency Response Plan secured in the **oBSMP [EN010149/APP/7.14.2]** which further reduces risk. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS Original Equipment Manufacturers advise that hose streams should not be directly discharged on BESS battery systems because this can significantly prolong a BESS failure event. A defensive tactic known as boundary cooling is used, which typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. This also ensures that water usage and environmental pollution risks are minimised.

Summary Position of Interested Party Nocton Parish Council [RR-304]	Applicant Response
	The **oBSMP [EN010149/APP/7.14.2]** and **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. If required, the BESS compound can accommodate water storage over and above the minimum currently required under NFCC guidance; the drainage system would be designed to fully capture external firefighting water, where the stored water would be tested before release or, if necessary, removed by tanker and treated offsite. If the captured firefighting water is deemed suitable, it can be reused by firefighters if additional water supplies are required for continued boundary cooling. Boundary cooling discharges water at equipment external surfaces and does not come into contact with battery systems, meaning there are minimal pollution risks.
Biodiversity	
This proposal will also have a negative effect on local wildlife and ecosystems, as they will disrupt the natural habitat of the wildlife. The panels can kill insects and other small creatures as a result of the solar radiation. Migrating wading birds have been known to crash into the panels, especially at night, thinking that the shimmering glare is water. Noise and light pollution is another detrimental feature of these solar farms that not only affects wildlife but people who live and travel by them.	**Aquatic invertebrates** The limited research available suggests there may be an attraction from solar PV modules to aquatic invertebrates due to the reflection of polarised light. However modern solar PV modules are designed to absorb as much light as possible and are typically coated with an anti-reflective film to help reduce this type of potential effect**.** **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** outlines the survey work and assessment carried out to inform the Proposed Development, and no extensive aquatic habitats likely to support a diverse assemblage of aquatic insects were identified and no designated sites identified for their aquatic invertebrates are located in close proximity to the Proposed Development. In addition, 6m buffers would be maintained from existing watercourses and an appropriate buffer from the ponds present to help reduce any such effect, as secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138]. No significant impacts on aquatic invertebrates were identified. **Wading birds** Collision with infrastructure on solar farms has been reported as a cause of mortality in birds, including endangered species (Penniman & Duffy, 2021), although the frequency of such incidents varies amongst sites (e.g. Kagan et al., 2014; Visser et al., 2019; Kosciuth et al., 2020), with one

Summary Position of Interested Party Nocton Parish Council [RR-304]	Applicant Response
	UK study finding no evidence of bird mortalities from solar panels (Feltwell, 2013). Some concern has been expressed that birds might collide with solar panels if they were to mistake them for waterbodies, a phenomenon sometimes referred to as the 'lake effect' (Kagan et al., 2014). It might be expected that such an effect would pose the greatest risk to migratory waterbirds and although a relatively high proportion of 'water-dependent' species were amongst the collision fatalities recorded at one large solar installation (Kagan et al., 2014) there is no evidence to directly support the 'lake effect' (Kosciuch et al., 2020). An evidence review of the impact of solar farms on birds in the UK suggests that the collision risk presented by Solar PV Modules to birds is low (*Hanson et al 2017*). **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** has not identified any significant impacts in relation to wading birds. Surveys carried out within the Order Limits and surrounding area show that there are not significant numbers of wading birds using the Site, nor does the Proposed Development sit on a migratory route or flight path between wetland sites. Details of breeding and wintering bird surveys undertaken are provided in **ES Volume 3, Appendix 7.2: Breeding Bird Survey [EN10149/APP/6.3]** [APP-083] and **ES Volume 3, Appendix 7.3: Wintering Bird Survey [EN10149/APP/6.3]** [APP-084] respectively. Monitoring is proposed of the bird populations within the Order Limits throughout the operational phase in response to the Proposed Development and biodiversity enhancement provided, which will add to the evidence research base. The results of this monitoring will be reported back to the local planning authority. The monitoring, alongside habitat creation and management through construction and operation, is secured through a commitment in the **oLEMP [EN010149/APP/7.9.2].**
General – policy compliance	
This Parish Council believes that the proposed application does not conform with the following government planning policies: NPPF paragraphs 183 and 187, NPS EN1, NPS EN3.	The **Planning Statement [EN010149/APP/7.2.2]** [AS-018] outlines how the Proposed Development complies with national and local planning policy. Section 6 of the Planning Statement sets out the legislative context, including the relationship between the Planning Act 2008, relevant NPSs and the Proposed Development. Sections 6.3 and 6.4 set out the national policies against which the Proposed Development will be determined and other local and national policies that may be important and relevant matters for the SoS's decision, which may include the NPPF. Whilst not the primary policy for the determination of NSIPs, the NPPF has been assessed

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	in the Planning Policy—Table of Compliance, Table 4, which can be found in **Appendix 3** of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.** The substantial benefits and need for the Proposed Development as set out in Section 3 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018], including the delivery of CNP infrastructure to contribute towards meeting national energy objectives, outweighs the residual landscape effects when applying the planning balancing exercise to the Proposed Development with no requirement to demonstrate exceptional circumstances given that the presumption for allowing the DCO.
Health	
The miles and miles of shimmering cornfields and other green crops you see across the Lincoln Heath are going to be obliterated by these solar panels. Arable fields and grasslands have a pleasing and calming effect on people's mental health. This incongruous addition to the landscape must only have a detrimental effect on people's general welfare.	The Applicant recognises that changes to the visual environment can impact upon mental health and wellbeing of residents. It is also acknowledged that assigning an effect on personal perception of the landscape and its mental health and wellbeing value is dependent on subjective interpretation of the landscape as a whole and of individual views by an individual and collective set of receptors. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] considers the impacts on residential amenity and the users of PRoW, in addition to assessing visual impacts and considering how the project might alter views for nearby residents. The assessment concludes that significant major and moderate adverse visual effects are likely to occur during the construction, operational (years 1 and 10) and decommissioning phases for users of PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary. While these changes cannot be fully mitigated, the design includes embedded screening measures to reduce visibility where possible, while additional mitigation measures include the adoption of the **oCEMP [EN010149/APP/7.7.2]**, **oLEMP [EN10149/APP/7.9.2]**, **oDEMP [EN010149/APP/7.13.2],** and the **oSMP [EN010149/APP/7.11.2]**. Changes to visual amenity on PRoW will be mitigated against in the form of new hedgerow planting or structural planting belts where impacts are expected to be significant, which will result in these impacts becoming insignificant by the tenth year of operation.

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	The Applicant also recognises that there is a substantial number of Relevant Representations from members of the public, Parish Councils and local opposition groups that cite concern about physical and mental health and wellbeing, related to a wider range of factors. The Applicant is content that receptors and health pathways, and individual environmental effects related to health and wellbeing have been appropriately considered, assessed and mitigated for (where practicable) as per the approach agreed at EIA Scoping. However, given the number of representations (noting that mental health can be affected by the clear provision and articulation of information), the position of key stakeholders and the fact that the approach to consideration of health and wellbeing is split across a number of different ES chapters, Management Plans and other documents (such as the **Equality Impact Assessment [EN010149/APP/7.18]** [APP-0151]), the Applicant considers that it would be beneficial to provide a comprehensive document that consolidates these elements in one place to demonstrate the consideration of health pathways through the submission a **Health and Wellbeing Summary Statement [EN010149/APP/8.10]** at Deadline 1. As summarised in the **Planning Statement** [**[EN010149/APP/7.2.2]** [AS-018], as well as significantly contributing to meeting policy commitments and legal decarbonisation targets for securing renewable energy, the Applicant notes that there are several enhancements secured within the Project that would contribute to positive physical and mental health pathways that would help to offset residual adverse effects. These benefits occur during different stages of the Proposed Development's lifetime. The Proposed Development includes the following other benefits: • Proposed enhancements and improvements to the local footpath and cycle network including the provision of new PRoWs: - Linking RAF Digby to Scopwick. This footpath will be created and made available at the beginning of the construction phase. - Providing a connection between the existing PRoW west of the A15 to New England Lane. - Providing a connection across the A15 by linking Temple Road to Bloxham Woods Car Park. • The creation of four new permissive paths:

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

- In addition to this, proposals include the enhancement of 2km of existing PRoW, which will attract new users to the area and make this green infrastructure more accessible to local residents and tourists. The overall impact of the Proposed Development on users of PRoW and permissive paths during the operational phase will be slightly beneficial through the creation of new routes, increasing connectivity and access to green spaces within the study area.
- A new community growing area to the north of Scopwick. The community growing area would be located adjacent to existing community facilities along Vicarage Lane (including Scopwick Cemetery, park and play area) and is adjacent to the Spires and Steeples Trail and Stepping Out Scopwick Loop. The community growing area would be secured via the **oLEMP [EN10149/APP/7.9.2]** and allows for permissive access 364 days a year to an area of up to 2ha for community use during the operation of the Proposed Development. The detailed design of the space would be developed post-DCO consent in conjunction with the Community Liaison Group.
- Providing a variety of biodiversity benefits including: new habitat for invertebrates, reptiles, amphibians, small mammals and birds; vegetated cover for foraging and dispersal, to maintain bat flight lines across the landscape, and provide a winter seed source for birds set out within the **oLEMP [EN10149/APP/7.9.2]**.
- The Proposed Development commits to delivering a minimum Biodiversity Net Gain of 10% as secured within the **oLEMP [EN10149/APP/7.9.2]**. This has been assessed in **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095].
- Provision of an **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153], which will:

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	- Increase direct and indirect employment and opportunities; - Lever potential of the Proposed Development and other similar schemes in the local area, to encourage the next generation to take up careers in the renewable energy sector and invest their futures in Lincolnshire; - Engage effectively with local businesses and wider supply chain, and - Assist in development and dissemination of local knowledge and skills relating to renewable energy infrastructure. • The Applicant has an established record of adding legacy value through supply chains and has committed to promoting the delivery of economic benefits generated by the Proposed Development to residents and business. on the Proposed Development and catalysing increased capabilities and specialisms in green construction and manufacturing across Lincolnshire. This is set out within the **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153].
Land contamination	
We are also concerned regarding the pollution of the Lincolnshire limestone aquifer, which lays some 20m below the surface of the land that is going to be affected. PV panels contain many carcinogenic materials such as lead, cadmium, and silver. If the panels begin to delaminate over time, these heavy metals mixed with acid rain will not only contaminate the soil but percolate down into the aquifer.	The potential for groundwater to be adversely impacted by the development has been considered in detail by the assessment in **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]**. This considered the current baseline sensitivity of the groundwater, and then identified works during construction, operation or decommissioning that could cause pollution to occur. Mitigation measures to prevent pollution are included in the management plans as detailed below. For the site, the groundwater receptors are assigned high sensitivity in some areas (where there is a principal aquifer and a groundwater source protection zone), and in other locations the groundwater sensitivity is medium or low. Due to the robust mitigation measures that are included in management plans for all three phases of the Proposed Development, the potential impact on groundwater when mitigation measures are in place is assigned a significance of low adverse. This means that the residual effect on the groundwater receptors (of all sensitivity levels) is not expected to be significant due to the measures that will be in place to protect the receptor. Proposed mitigation measures, that will be secured by the **oCEMP [EN010149/APP/7.7.2], oOEMP [EN010149/APP/7.10.2]**, and **oDEMP [EN010149/APP/7.13.2]** include:

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	• completing site investigation work to assess if there is any existing contamination on-site that requires remediation; • measures to prevent disturbance of existing contamination; • emergency procedures to manage accidental spillages and leaks in order to minimise any risk to the soil and groundwater; • completing a piling risk assessment to ensure that potential impacts to groundwater are identified and minimised; and • measures to manage firewater associated with the BESS. Firewater will be collected on-site, as secured by the **oOEMP [EN010149/APP/7.10.2].** Therefore any contaminants present within this water would not be released to the environment, and would not be able to leach into the groundwater. Run-off from construction areas will be managed during works by the **oCEMP [EN010149/APP/7.7.2]** and will not be released directly to the soil/groundwater. This will ensure that there is no accidental release of contaminants from working areas into the wider environment. During the operational life of each solar panel, maintenance operations will ensure that no chemicals or heavy metals will be released from within the panels. Any damaged panels would be removed and replaced in accordance with the **oOEMP [EN010149/APP/7.10.2]**. Panels that are correctly maintained will not result in any release of chemicals or heavy metals to the environment.
Land use	
When these large solar arrays are erected, they will deprive 75% of the land from sunlight, rainwater will be directed into rivelets that will form between the panels. Laying this land into an unnatural fallow state for 40 years could have such a detrimental effect that it may not be able to be remediated to its original state, only time will tell, because this is an experiment. it's not been done before on the this scale in this country previously.	Any precipitation falling on each solar panel will runoff the panels and flow towards / infiltrate in the rain shadow of the down-slope modules. Runoff from solar panels could result in the kinetic compaction of soils at the base of the panels and the intensification of runoff into rivulets running along the trailing edge of the rows of panels. Sustainable management of the post development situation in terms of vegetation planting can be used as a means of managing surface water runoff from the solar panels as secured in the **oLEMP [EN10149/APP/7.9.2].** To ensure that there is no increase in surface water runoff, managed sustainable vegetation (with a good soil structure e.g. chisel ploughed soils) will be allowed to grow beneath the solar panels, which will avoid kinetic compaction and ensure that any potential instances of rivulet formation are minimised, and surface water runoff flows over the ground in a natural way Further detail on run-off and flood risk

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	is detailed within the **Flood Risk Assessment [EN010149/APP/7.16.2]** [AS-016]. Sustainable drainage systems will also be in place as detailed in the **Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] to manage run-off from Solar PV Modules. The land will not be in an unnatural fallow state for 40 years as it will be in managed permanent grassland and the quality of land and soil retained during the lifetime of the project in accordance with the **oSMP [EN010149/APP/7.11.2]**.
While Nocton Parish Council support the production of green energy (we have installed 20 PV panels on our Village Hub). We do however have significant concerns about the proposed Springwell Solar Farm development, some 4 miles south of the parish of Nocton. While the proposal will not have a direct impact on this settlement, it will indirectly affect our residents. and visitors to the parish The proposal covers approximately 1,400 ha of prime agricultural land, on and adjacent to the Lincoln Heath. The loss of this vital food production is a significant issue considering the country only produces 60% of the food it consumes. All of the land within the proposal has the benefit of a crop irrigation system The concerned land being classified as best and most versatile, Grades 2, 3a with some 3B.	Policy in NPS EN-1 and NPS EN-3 recognises that solar development may take place on agricultural land, but that applicants should not site their scheme on Best and Most Versatile (BMV) agricultural land without justification and, where demonstrated to be necessary, that the poorer quality land should be preferred over higher quality. National policy in NPS EN-1 and NPS EN-3 as set out in the Planning Statement distinguishes between the use of BMV (Grades 1, 2 and 3a) and non-BMV (3b and 4). While 3b may still be farmable, it is not considered by policy to be of sufficient quality to be defined as BMV agricultural land. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of Best and Most Versatile (BMV) land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm.

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	In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is. In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is therefore estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. The Proposed Development will result in the temporary use of some higher grade (BMV) agricultural land for solar development, cabling, access tracks and green infrastructure, together with some permanent use for green infrastructure only. The amount of BMV agricultural land used has been minimised through the site selection and design development process as outlined in **ES Volume 1, Chapter 4: Reasonable Alternative Considered** [APP-044]; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely. As set out in the **Planning Statement [AS-018]** at paragraph 8.8.15 onwards, out of the 1280ha of land within the Order Limits, 231.7ha is BMV, which is proposed to be utilised for hard infrastructure, i.e. collector compounds, Springwell Substation, Solar PV development, and BESS. A further 77ha is proposed to be used for Green Infrastructure, with the remainder (232.5ha)

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	required for the installation of cabling, which will be available for agricultural use once the cable has been installed. The area of BMV agricultural land, which will therefore be unable to be farmed while the development is in place (up to 40 years) therefore represents approximately 24% of the Order Limits. This increases to 42% if the area to be temporarily out of use while the cable is being laid is included.
When there are other indifferent lands available, together with some 240,000 ha of industrial roofs that have not got panels fixed to them it seems a dreadful waste of good agricultural land.	Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*" Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3. Consideration was therefore given to areas in the UK where there was capacity in the network to take power generated by new renewable energy projects, including solar development.
Landscape and visual impacts	
The visual impact of a large solar array such as is planned will have a detrimental impact on the vista across the Lincoln Heath. Such a concentration of panels will have an off-putting effect when people come—not only to visit this parish from, say, the south of	This comment is a replication of a comment made by Metheringham Parish Council. Please refer to the response to Metheringham Parish Council above.

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England, but also when they come to view properties for sale.	
Public Rights of Way	
Many of the visitors to our parish use the public rights of way, especially around Blankney, where these PROWs are going to be nothing more than corridors between glass panels. We believe it will have an adverse effect on the tourist industry in our area.	As set out in the Scoping Report, the Applicant has recognised that there is the potential for effects relating to tourism resulting from amenity impacts such as visual impacts and impacts to PRoW during all phases of the Proposed Development. **ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2]** provides an assessment of likely significant effects on tourism, setting out (paragraphs 13.5.43 to 13.5.50) the overall scale and volume of the tourist economy within Lincolnshire and North Kesteven, and identifying the primary tourist sector strengths and specific assets which may be affected by environmental change related to the Proposed Development. This notes that the Stepping Out network appears to be of particular significance to the tourist economy and is heavily endorsed by the North Kesteven tourism office. As stated in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] there is extremely limited theoretical visibility of the Proposed Development beyond 3km – as such, the assessment of effects on tourism are also considered across North Kesteven with a focus on effects to tourism receptors within a 3km radius of the Order Limits. The assessment at **ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2]** considers that the construction phase may have effects on the tourist economy as a result of impacts to visitor experience and behaviours, and linked impacts to tourism business receptor performance, resulting from visual and noise construction effects – the environmental effects from other assessments on tourist receptors are summarised from paragraph 13.7.20 to 13.7.27. With regard to users of PRoW, detailed management measures will be subject to agreement with relevant officers within the relevant planning authorities which will be detailed in a PRoW and Permissive Path Management Plan (PRoWPPMP) prior to the commencement of construction works, which is secured in the **Draft DCO [EN010149/APP/3.1.2]**. The Spires and Steeples Trail is part of the Stepping Out network and traverses Springwell East in a north/south alignment. Any

Summary Position of Interested Party Nocton Parish Council [RR-304]	Applicant Response
	construction phase works near to this trail and all other PRoW within the Order Limits will be undertaken in line with the **oPRoWPPMP [EN010149/APP/7.12.2]**. During the construction and operational phases, significant visual effects from PRoW and the Stepping Out Network may adversely impact the number of visitors to the area. The Stepping Out Network is heavily utilised by visitors in the area, encourages active lifestyles and the use of the countryside for tourist purposes. Visual impacts may detract from the visitor experience of the countryside and thus reduce the number of tourists to the study area. However, the Stepping Out Network has been designed to link various routes across North Kesteven and therefore, the networks surrounding the Order Limits may experience a reduction in visitor numbers, but the Stepping Out Network more widely will not be impacted. 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. Mitigation measures have been adopted as part of the design principles to maintain a set back of 15 metres from either side of existing or proposed PRoWs to PV modules (as secured in the **oPRoWPPMP [EN010149/APP/7.12.2]**) and additional planting to screen views. The Applicant will undertake good practice measures to avoid or minimise environmental disruption relating to construction activities and operation, and has worked to produce a plan to manage public access across the PRoW and permissive path network, alongside committing to enhancements to the network in the operational phase to promote accessibility across the area.
Traffic and transport	
During the construction phase, the amount of traffic that will be prevalent on our already overloaded road system, both locally in our parish and generally around the district, will cause an enormous amount of congestion and issues.	**ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010] **and ES Volume 3, Appendix 14.1: Transport Assessment [EN010149/APP/6.3]** [APP-123] set out the potential for traffic impact. Suitable mitigation measures are outlined in the **oCTMP [EN010149/APP/7.8.2]**. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures outlined in the **oCTMP [EN010149/APP/7.8.2].** These includes measures including a Construction Staff Travel Plan, vehicle routing plans, use of locally sourced materials, a community liaison group, monitoring and enforcement measures.

Table 3-11: National Grid Electricity Distribution (East Midlands) plc

Summary Position of Interested Party	Applicant Response
National Grid Electricity Distribution (East Midlands) plc [**RR-288**]	
Land interest	
The application includes land in or upon which NGED may have assets and which may include (but are not limited to) high voltage electricity cables. NGED is currently reviewing the draft Order setting out the Authorised Development to establish the extent to which their apparatus and interests are affected. 4. While NGED will continue to seek to have positive engagement with the applicant in relation to the project, NGED needs to ensure that the wider powers being sought in the Order will not have a detrimental impact on NGED's electricity network and its duties under the EA 1989. This includes ensuring acceptable terms of any proposed protective provisions. 5. NGED is therefore making this representation as a holding objection to the application until an asset protection arrangement has been agreed between the parties. No formal agreement has yet been concluded and accordingly we are lodging this representation to protect NGED's position pending conclusion of an appropriate agreement. Once NGED is satisfied that its network is protected, we will notify the Planning Inspectorate promptly and withdraw the objection.	The Applicant acknowledges that National Grid Electricity Distribution (East Midlands) plc (NGED) has various interests in respect of rights and apparatus within the proposed Order limits. The interests in terms of land plots that are presently known can be found within the **Book of Reference [EN010149/APP/4.3.2]** [AS-007] and can be identified on the **Land Plans [EN010149/APP/2.2.2]** [AS-004] and **Crown Land Plans [EN010149/APP/2.7]** [APP-011]. The Applicant has engaged with NGED's solicitors to seek to agree protective provisions which would be included in the DCO. NGED's solicitors have provided the Applicant with a copy of NGED's standard protective provisions, which the Applicant is currently reviewing. The Applicant will provide NGED with comments on their provisions in due course, with a view to refining and resolving issues as far as possible.

Table 3-12: Scopwick and Kirkby Green Parish Council

Summary Position of Interested Party Scopwick and Kirkby Green Parish Council [RR-369]	Applicant Response
BESS	
The inclusion of a Battery Energy Storage System introduces substantial safety concerns. Such systems are known to pose a significant fire risk. In the event of a fire there would be a very large volume of black smoke carrying toxic fumes. As we are aware current policy requires the fire to be left to burn or to be doused with significant quantities of water. The water is used to douse the fire and to help cool surrounding infrastructure in the attempt to prevent the fire spreading into other BESS units. The requirement of significant amounts of water and no fail-safe way of capturing all the contaminated water raises serious risks to the Lincolnshire Oolitic primary aquifer which is vulnerable to permeation.	The Applicant has applied industry best practice to the design of the BESS (Battery Energy Storage System), including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems" and these measures are agreed with Lincolnshire Fire and Rescue Service in the **Draft Statement of Common Ground - Lincolnshire Fire and Rescue Service [EN010149/APP/7.24]** [APP-0157]. The Applicant is engaging with the UK Health Security Agency on the subject of thermal runaway and details can be found in the **Statement of Common Ground – UK Health Security Agency [EN010149/APP/8.6].** The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the **Outline Battery Safety Management Plan (oBSMP) [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** These documents set out the very low likelihood of such an event (1 in 7700 years), an aggregate figure which accounts for all example BESS enclosures within the compound) along with the worst case impacts that could occur. The **BESS Plume Assessment [EN010149/APP/7.19.2]** demonstrates that should a thermal runaway event occur, it would not pose significant risks to nearby human health receptors, including the closest residential receptors to the proposed BESS compound (approx. 440m to the southeast). In the very unlikely event that harmful impacts could occur, harmful impacts are predicted to only occur within tens of metres rather than hundreds of metres from the specific BESS enclosure involved in any thermal runaway event. Due to the typical weather conditions at the Order Limits, the smoke plume would likely be less than 6m in width. Higher wind speeds typically disperse external flaming from a BESS enclosure, shortening flame length and diluting the resultant smoke plume ensuring fire emission impairment distances are reduced. It should also be noted that the modelled plume remained well formed and showed a gradual rise and dilution as it moved downwind, reducing the risk to people at ground level.

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	The indicative design of the BESS enclosure and site layout follows guidance to lay assets out in a manner that limits the ability for a thermal runaway event to spread to adjacent enclosures or significantly impact the local community. Lincolnshire Fire and Rescue Service would respond to any BESS event according to a mutually agreed Emergency Response Plan secured in the **oBSMP [EN010149/APP/7.14.2]** which further reduces risk. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS Original Equipment Manufacturers advise that hose streams should not be directly discharged on BESS battery systems because this can significantly prolong a BESS failure event. A defensive tactic known as boundary cooling is used, which typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. This also ensures that water usage and environmental pollution risks are minimised. Generally, as demonstrated during a range of recent BESS full scale burn testing and real world incidents, total BESS burn out times would typically be defined as 5 to 10 hours for battery systems operating at a high state of charge. Burn out times can be longer, such as 12 hours, where the length of the burn may be extended due to the BESS operating at a low state of charge when the thermal event occurred. As stipulated in the **oBSMP [EN010149/APP/7.14.2]** the BESS Compound would be designed to integrate fire hydrants with water delivered from static water tanks (a pump driven system) for firefighting, depending on available water supply and in accordance with NFCC Guidance. Water provision will be designated for the cooling of adjacent BESS and ancillary equipment. The **oBSMP [EN010149/APP/7.14.2]** and **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. They also set out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. The Applicant has engaged with Lincolnshire FRS throughout the pre-application period, with ongoing dialogue on suitable preventative measures and response to any thermal runaway event. Comments received from the Lincolnshire FRS have been incorporated into the design of the BESS compound, **oBSMP [EN010149/APP/7.14.2]** and the **BESS Plume Assessment [EN010149/APP/7.19.2].** Part of the mitigations discussed and agreed with Lincolnshire FRS relate to the potential need for

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	water to cool adjacent enclosures in the event of a fire. If required, the BESS compound can accommodate sufficient water storage over and above the minimum currently required under NFCC guidance. Appropriate measures would be agreed with the Lincolnshire FRS during the detailed design stage.
We also have serious concerns about the toxic smoke deposition on land downwind and the risk to communities living or working in its path.	The Applicant is engaging with the UK Health Security Agency on the subject of thermal runaway and details can be found in the **Statement of Common Ground – UK Health Security Agency [EN010149/APP/8.6].** This includes further analysis tabled for completion during detailed design based on the technology and products available at the time that can be used. The **BESS Plume Assessment [EN010149/APP/7.19.2]** demonstrates that should a thermal runaway event occur, it would not pose significant risks to nearby human health receptors, including the closest residential receptors to the proposed BESS compound (approx. 440m to the southeast). In the very unlikely event that harmful impacts could occur, harmful impacts are predicted to only occur within tens of metres rather than hundreds of metres from the specific BESS enclosure involved in any thermal runaway event. Because of the buffer zones to sensitive receptors in all wind directions. the Applicant is confident that any toxic gas emissions to sensitive receptors will be below Public Health England (PHE) guideline exposure limits. Plume studies based on similar LFP battery systems to the system used in the **BESS Plume Assessment [EN010149/APP/7.19.2]** (utilising modelling parameters suggested by the UKHSA), was commissioned for the Cottam and West Burton DCO schemes in Lincolnshire. These plume studies established that a single enclosure BESS fire would have an insignificant impact on off-site receptors. All BESS fire emissions were below AEGL-1 levels i.e. less than 1 part per million. The closest receptor in the Cottam plume study was 320 metres and the closest receptor in the West Burton study was 510 metres. The closest receptor in the Cottam plume study was 320 metres and the closest receptor in the West Burton study was 510 metres.
The applicant is reluctant to be drawn on the specifics of the technology that will be installed, but is it right that the community is asked to sit back and trust the developer, who ultimately has a financial interest and will balance cost against safety? We request the inspector insist on a	The Applicant has engaged with Lincolnshire FRS throughout the pre-application period, with ongoing dialogue on suitable preventative measures and response to any thermal runaway event. Part of this discussion is the recognition and agreement that there is no cumulative effect from this type of BESS facility when it comes to a thermal runaway event; every safety measure in place is aimed at ensuring the fire does not spread from one container to the next. This is

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clear path regarding the technology that will be implemented if consent was granted. The community of Scopwick & Kirkby Green urge the inspector not to be swayed to recommend inappropriate or untested technology. Our community should not be used as a test. Whilst the Inspector will only examine the Springwell Solar application site we are aware of a further 3 BESS sites currently in planning that will be in the same proximity. You must be aware of the cumulative impact this will have! Please also refer to the EPRI's Battery Energy Storage System Failure Incident Database that demonstrates a more comprehensive list of BESS incidents. The applicant in this case will only have enough water on site for 4 hours! In their submission the applicant endeavours to diminish the potential risks of BESS fire incidents, however there are real and present examples as highlighted by Moss Landing 2025. The inspector must not allow the applicant to sidestep these issues. Given the high risks posed by the inclusion of a BESS, it is essential for truly independent assessments to be conducted regarding its safety and potential environmental impacts. We note the Environment Agency has already highlighted this as a significant concern. The Inspector should not rely solely on assurances from the applicant. The potential contamination of a primary aquifer and surrounding land would have devastating and long-lasting effects on the community and wildlife far	also one of the core principles of the NFCC Guidance. The Applicant has stringent procurement processes in place to ensure high quality and tested equipment is used on the Proposed Development. The EPRI BESS Failure Incident Database states *"The failure rate dropped by 98% from 2018 to 2024 as lessons learned from early failures have been incorporated into the latest designs and best practices".* The **oBSMP [EN010149/APP/7.14.2]** and **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. They also set out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. The Applicant has engaged with Lincolnshire FRS throughout the pre-application period, with ongoing dialogue on suitable preventative measures and response to any thermal runaway event. Comments received from the Lincolnshire FRS have been incorporated into the design of the BESS compound, **oBSMP [EN010149/APP/7.14.2]** and the **BESS Plume Assessment [EN010149/APP/7.19.2].** Part of the mitigations discussed and agreed with Lincolnshire FRS relate to the potential need for water to cool adjacent enclosures in the event of a fire. If required, the BESS compound can accommodate sufficient water storage over and above the minimum currently required under NFCC guidance. Appropriate measures would be agreed with the Lincolnshire FRS during the detailed design stage.

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outweighing any short-term benefits of renewable energy generation at this location.	
Biodiversity	
We also highlight the High Grove application in Swaffham where they are claiming they would see over 50% Biodiversity Net Gain. This applicant is proposing 10%. How are we to interpret these wildly different claims? There is a degree of scepticism that all these claims are rather dubious and rather difficult to substantiate and inserted to meet a planning requirement.	Requirement 8 of the Draft **DCO [EN010149/APP/3.1.2]** secures a minimum of 10% Biodiversity Net Gain (BNG), confirming the Applicant's compliance with the statutory requirement pursuant to the Environment Act 2021. The **oLEMP [EN10149/APP/7.9.2]** sets out how habitats will be created and managed during the construction and operation of the Proposed Development to deliver this minimum 10% biodiversity uplift. If granted permission, a final detailed LEMP would be produced as part of the requirements. **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095] provides indicative figures substantially above the minimum 10% commitment, demonstrating that the Applicant is expecting to deliver in excess of the minimum. The BNG Assessment provides for the following indicative figures subject to design change: 31.66% BNG in respect of habitat units, 20.68% in respect of hedgerow units and 13% for water course units. The habitat condition criteria that must be reached to deliver the gain in biodiversity is set out within the BNG Assessment and this will form the basis of post construction monitoring ensuring that the predicted uplift is delivered. Biodiversity gains predicted during the operational phase are legally enforceable for a minimum of thirty years and the Applicant is fully aware and committed to the investment in staff and machinery that will be required. This should give confidence that the habitat management plan will be implemented should such approval be granted.
Cumulative impacts	
Scopwick and Kirkby Green are facing an undue burden due to the presence of other large-scale developments that are also pending planning. The cumulative impact of these projects risks overwhelming local infrastructure, disrupting the rural landscape, and further eroding the quality of life for residents. This part of Lincolnshire is	An assessment of the inter-project cumulative effects with other existing development and/or approved developments is presented in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].** This assessment considers the potential combined impacts of Springwell Solar Farm alongside other nearby projects and outlines that no significant inter-project cumulative effects are anticipated. No other known large scale developments have been

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blessed as a picturesque area and it should not become an industrial landscape spoiled for a generation.	identified which would result in any significant cumulative effects on landscape character in the vicinity of Scopwick or Kirkby Green.
Flood risk	
The installation of the panel supports by percussion piling will destroy the efficient land drainage systems that are in place which deliver millions of litres into ditches that successfully discharges into Scopwick Beck, once this land drainage infrastructure is destroyed by both impact and vibration shock waves from the percussion piling. Currently rainwater is discharged by these drainage systems, once the ground is saturated this water from 80ha of land will simply run off the surface of the ground downhill into the village settlement. This could have devastating consequences for homes, businesses, and local ecosystems, particularly in a village already susceptible to water-related issues. Please see Lincolnshire County Council's Section 19 Flood Report, conducted in the aftermath of recent flood events in Scopwick. The Flood Forum also have an ongoing survey into the affects of flooding specifically in Scopwick.	**Appendix A** of the **Flood Risk Assessment [EN010149/APP/7.16.2]** [AS-016] details the proposed outline drainage strategy for the Proposed Development. Any precipitation falling on each solar panel will runoff the panels and flow towards / infiltrate in the rain shadow of the down-slope modules. This feature will enable the use of the rain shadow area of the panels to maintain the infiltration potential of the site. Any land drainage systems damaged as part of the development (through piling or other construction methods) will either be reinstated or diverted with equivalent drainage systems, to ensure no lasting changes compared to the baseline. This is secured in the **Outline Construction Environmental Management Plan** (oCEMP) **[EN010149/APP/7.7.2].** A surface water drainage system will be developed as part of the Proposed Development to capture and manage any additional run off from the site and ensure that pre development (QBAR greenfield) run off is maintained with no additional flows entering Scopwick Beck or any other watercourse. The retention of flows to QBAR greenfield rates will result in a reduced peak flow from current natural runoff from the site during extreme rainfall events, offering a reduction in off site flows for all rainfall events in excess of the QBAR (approx. 1 in 2 year) event. Excess flows will be retained on site in suitably designed attenuation features. Auxiliary components such as inverter stations, storage compounds and switch rooms are treated as impermeable areas and **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] shows that any additional volumes of runoff from these impermeable areas can be prevented from freely draining from the site. Generally these areas are negligible and are isolated from any other areas of hardstanding which makes a traditional piped surface water drainage sewer to a discharge location an over-engineered option and is often unfeasible. Drainage for the areas of hardstanding of auxiliary components can be shown as backfilled trenches at the perimeter of these structures. The trenches take the runoff from the

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	impermeable areas and attenuate at the source, therefore mitigating the runoff from the site. The volume of these trenches could be reduced if infiltration rates are favourable. The Lincolnshire County Council's Section 19 Flood Reports relating to Scopwick attributed recent flood events to surface water from potentially numerous sources including – highway (and potentially groundwater) in both storm events, the nearby dyke and / or sewer flooding. The flooding is likely to have been attributed due to surface water runoff from / over the highway for the property in Kirkby Green, due to being at a lower elevation than the surrounding land and highway, as well as the nearby open ditches overtopping due to the heavy rainfall experienced. A number of recommendations were published as a result of the S19 investigations including repair works to a damaged culvert and general maintenance works of the highway drainage. The proposed surface water drainage strategy for the scheme will ensure no more surface water leaves the site that it currently does ensuring not detrimental impact on existing flood risk in the area.
General – Impacts on residential amenity and property values	
Although not a material planning concern, parishioners are concerned about potential property devaluation due to the proximity of a solar farm and associated infrastructure. We reference two studies below, that show there is an impact on property prices within the catchment of much smaller projects. The impact is very likely to be larger the larger the project.	The Applicant has sought to limit impacts on properties close to the Proposed Development in accordance with the Project Principles set out in the **Design Approach Document [EN010149/APP/7.3.2].** This includes the provision of appropriate offsets to local settlements and dwellings on a case-by-case basis (Principle 1.2) and maintaining the rural separation between local villages (Principle 2.3). An appraisal of visual effects on residential properties close to the Proposed Development is presented in **ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3]** [APP-111]. In total, it has been assessed that the residents of 25 dwellings would experience significant visual effects during year 1. Still, in most cases, by year 10, these effects would reduce in magnitude due to the establishment of mitigation and by year 10, they would not be significant. No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development,

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	such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. Following the Phase Two Consultation, the Applicant refined the development boundary, removing 68 Category 1 and 2 persons and all 154 Category 3 persons initially identified. After diligent inquiry, the Applicant does not consider there to be any remaining Category 3 persons. However, should any parties consider that their property has decreased in value as a direct result of the physical impacts from the operation of the Proposed Development, such as noise and vibration, they may be eligible to claim for compensation under Part 1 of the Land Compensation Act 1973.
General - sustainability	
A significant portion of the equipment for this project is likely to be sourced from China, particularly polysilicon (a crucial raw material), originates from China's Xinjiang region. There have been allegations of forced labour in the production of polysilicon, leading to concerns about ethical sourcing. In response, countries like the U.S. have implemented trade restrictions, such as the Uyghur Forced Labor Prevention Act (UFLPA), to prevent imports linked to forced labour. Approving a development with such associations undermines the principles of sustainability and human rights that should guide renewable energy initiatives. The applicant has avoided clearly answering where they will be sourcing their panels, Lithium batteries and associated materials from. In addition to the ethical concerns there really needs to be a comprehensive assessment of the environmental impact of manufacturing solar panels and associated products. The production of solar panels, particularly in regions with	The Applicant opposes the abuse of human rights and forced labour anywhere in the global supply chain. The procurement process for the Proposed Development has not yet started and would begin should development consent be granted. As part of this process, the Applicant would take a rigorous approach to ensuring its suppliers comply with relevant legislation (such as the Modern Slavery Act 2015) and its requirements as set out in an ethical procurement policy as detailed in the **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153]. . A full lifecycle GHG assessment has been conducted in **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1]** [APP-048], which takes into account a reasonable worst-case assessment of the embodied emissions from solar PV modules. This has used a wide range of data available from Environmental Product Declarations (EPDs) from solar PV modules from a range of source countries (including China as part of Asia) and includes the emissions of the manufacture and transport of these materials. All members of the supply chain will provide a carbon reduction plan where feasible, allowing for the optimisation of emissions associated with the supply chain. This measure will be secured in the **oCEMP [EN010149/APP/7.7.2]**. Inclusive of these embodied emissions the scheme has been demonstrated to have a net carbon negative effect, contributing to net carbon savings globally, and resulting in net GHG savings of over 9.6 million tonnes of CO_2e.

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high coal-based electricity (such as China), has raised concerns about the carbon footprint of manufacturing. Chemical waste from solar panel production, if not properly managed, can also contribute to environmental pollution. It seems there is very clear evidence that whilst the applicant can claim to be providing a Net Zero solution the reality is they have simply exported the issue to China and then shipped the product to the UK. Is this really a green solution? Throughout the consultation period the applicant was very reluctant to discuss their sourcing strategy.	
The environmental impact of the mining processes and industrial methods used to manufacture solar panels must not be overlooked. The carbon footprint and human cost of these practices are significant and contradict the sustainable principles renewable energy projects aim to uphold. The applicant provides a marketeer's view of panels in a beautiful setting. The process of manufacturing panels is anything but green. The long-term risks of panels and their chemicals leaching into the soil needs much more examination from truly independent bodies. Whilst we currently have not had a solar farm operational for 40-years the reality is the land will never return to agriculture. We have been told that there is serious risk that the soil will be contaminated. Furthermore, panels are categorised as toxic waste in the US. The applicant glibly wants us to believe and trust in them that the panels will not contaminate the soil and that they will be recycled. The communities around Dupont facilities in the US believed the lies promoted by Dupont that the chemicals used in the manufacturing process of Teflon were not harmful. These PFAS were polluting the	While the procurement process for the Proposed Development has not yet begun, the Applicant has considered potential environmental impacts associated with the manufacturing and transport of components of the Proposed Development as part of the Application. The full lifecycle assessment presented in **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1]** [APP-048] takes into account the emissions associated with the manufacture and transport of materials and components from source countries (including China as a part of Asia) and displays those emissions in tCO2e. The GHG savings of the Proposed Development outweigh the emissions associated with its construction, operation (including maintenance and replacement), and decommissioning, resulting in net GHG savings of over 9.6 million tonnes of CO2e. Carbon assumptions underpinning this assessment are included within **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1]** [APP-048], and are either based directly on the guidance or from best knowledge provided by design and engineering teams. The Applicant would embed mitigation measures such as the implementation of a carbon reduction plan, the responsible sourcing of materials, and a review of Environmental Product Declarations (which were the sources of multiple assumptions regarding manufacturing emissions, as shown in **ES Volume 3, Appendix 8.1: Raw Data and Emissions Factors [EN010149/APP/6.3]** [APP-096]).

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atmosphere and were also infiltrating local water supplies. Until a Class Action court case was ultimately successfully won Dupont denied all responsibility. Whilst we don't fully know what toxins could potentially enter the atmosphere or the aquifer our community does not want to be put in harm's way where exposure could result in similar issues as those impacted by the 'Forever Chemical', Dupont and the Teflon scandal resulted in birth defects, induced hypertension and testicular and kidney cancer and miscarriages. In the UK corporations convinced developers to clad tower blocks, as we saw with Grenfell this had tragic consequences. Large corporations typically serve their own and shareholder interests. In many cases these solar developments are sold on if planning is consented. In this scenario, we need to question who and where liability resides when the 40-year lifecycle ends. Who is ultimately responsible for the site clearance. There are many examples in the UK and worldwide where industrial sites are abandoned and never de-contaminated resulting in a wasteland. What absolute guarantees are there that this could not happen, and will any bond be sufficient to guarantee this land will have all contamination removed and be fit for first class agriculture in the future?	During the operational life of each solar panel, maintenance operations will ensure that no chemicals or heavy metals will be released from within the panels. Any damaged panels would be removed and replaced in accordance with the **oOEMP [EN010149/APP/7.10.2]**. Panels that are correctly maintained will not result in any release of chemicals or heavy metals to the environment. There are no expected leaks of chemicals from the BESS as part of normal operation and no contamination to the soil is anticipated. If there is any unexpected contamination from activities on site, this would be managed through measures detailed and secured within the **oCEMP [EN010149/APP/7.7.2], oOEMP [EN010149/APP/7.10.2],** and **oDEMP [EN010149/APP/7.13.2].** With faulty, damaged or end-of-life assets, a key method to reducing the risk of chemical impacts is to ensure they are removed and disposed of responsibly. The **oOEMP [EN010149/APP/7.10.2]** and o**DEMP [EN010149/APP/7.13.2]** also secure the approach to the recycling of Waste Electrical and Electronic Equipment (WEEE).
Land use	
The proposed development would lead to the loss of a considerable amount of high-quality agricultural land,	The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of BMV land has been

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graded 2, 3a, 3b (BMV) it has also benefitted from considerable EU grant aid to provide irrigation. This quality land is vital for food production and ensures the UK can provide food security in times of local conflict or international conflicts such as Ukraine which had a material impact on grain availability. What we don't grow we import at a cost to the environment and the desire to be Net Zero. The National Planning Policy Framework is clear that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. To be clear there is no poor land within the envelope of this development	minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The Applicant has sought to reduce impacts on BMV land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. This has influenced both the initial site selection process and the subsequent design evolution of the Proposed Development. This includes retaining fields for arable production that comprise solely of Grade 1 or 2 land. It would not be possible to advance with this project without the use of some BMV land, and the Applicant has provided further justification for this, as referenced in Section 11.9 of **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** and within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.** In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002%

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	is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. The Proposed Development will result in the temporary use of some higher grade (BMV) agricultural land for solar development, cabling, access tracks and green infrastructure, together with some permanent use for green infrastructure only. The amount of BMV agricultural land used has been minimised through the site selection and design development process as outlined in **ES Volume 1, Chapter 4: Reasonable Alternative Considered [EN010149/APP/6.1]** [APP-044]; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely. As set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] at paragraph 8.8.15 onwards, out of the 1280ha of land within the Order Limits, 231.7ha is BMV, which is proposed to be utilised for hard infrastructure, i.e. collector compounds, Springwell Substation, Solar PV development, and BESS. A further 77ha is proposed to be used for Green Infrastructure, with the remainder (232.5ha) required for the installation of cabling, which will be available for agricultural use once the cable has been installed. The area of BMV agricultural land, which will therefore be unable to be farmed while the development is in place (up to 40 years) therefore represents approximately 24% of the Order Limits. This increases to 42% if the area to be temporarily out of use while the cable is being laid is included.
The UK climate is also not conducive to solar energy as highlighted by The World Bank Report Global Photovoltaic Power Potential By Country. Whilst solar plays a role in a few months of a British summer there will be many days where little or no energy is produced. This does not justify taking grade 2,3a & 3b farmland out of production.	The Applicant accepts that there are other global locations where solar yields are higher than in the UK, but (a) that does not mean that solar yields are too low to be of benefit to UK decarbonisation, and (b) solar generation in other countries may be important for them to achieve net zero, but will not generally support the UK to achieve its legally binding net zero obligation. NPS EN-1 confirms that large-scale ground mounted solar farms have a critical role to play in achieving the government's decarbonisation and energy security aims, and establish a critical national priority (CNP) for low carbon infrastructure, including large-scale solar farms, because of the decarbonisation, energy security and affordability benefits that they deliver.

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	Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*" NPS EN-1 explains at paragraph 3.3.20 that *"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"*, and the government's Clean Power 2030 Action Plan states that to deliver a path to clean power, the government has *"high ambition. That means 43-50 GW of offshore wind, 27-29 GW of onshore wind, and 45-47 GW of solar power, significantly reducing our fossil-fuel dependency."* Projects are needed to deliver energy at scale, as discussed in Section 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135], which concludes that the development of large sites is essential to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity in the national grid where it occurs. Consideration was therefore given to areas in the UK where grid connections were available and suitable for solar development, in parts of the country where irradiance was suitably high. As shown on Figure 7-2 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135], this includes Lincolnshire and the areas within the Order Limits.
Landscape and visual impacts	
The scale and visual impact of the solar farm will irreversibly alter the rural character of the area. Many residents highly value the natural beauty and tranquillity of the region, and its industrialization could negatively affect	The Applicant has developed the design of the Proposed Development to provide a sensitive response to the local environment and reduce potential impacts in accordance with the Project Principles set out in the **Design Approach Document [EN010149/APP/7.3.2]**. This includes Project Principles 2.1-2.5 which were included to embed a landscape-led approach to the design of the Proposed Development. A full list of Project Principles is provided in the **Design**

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the mental well-being and quality of life of the surrounding communities.	**Approach Document [EN010149/APP/7.3.2]** together with an explanation of how they guided decision making and informed the Proposed Design. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] presents an assessment of effects on landscape character and visual amenity. The assessment acknowledges that some significant effects on landscape character would be experienced for the duration of the operational phase of the Proposed Development. This is considered to be a long term effect. However, the landscape and visual effects of the Proposed Development are largely reversible following decommissioning. The assessment concludes that during decommissioning there would be a net beneficial effect on landscape fabric (woodland, hedgerows etc) as a result of the maturation of mitigation planting established through the operational lifetime of the Proposed Development. For the reasons outlined in the Applicant's response to Coleby Parish Council above, it is not considered accurate to describe the effects of the Proposed Development as an 'industrialisation' of the landscape. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] does however acknowledge that the construction and operational effects of the Proposed Development on visual amenity would be adverse. Mitigation measures have been embedded into the design of the Proposed Development to minimise visual effects where possible and appropriate. The Applicant recognises that changes to the visual environment can impact upon mental health and wellbeing of residents. It is also acknowledged that assigning an effect on personal perception of the landscape and its mental health and wellbeing value is dependent on subjective interpretation of the landscape as a whole and of individual views by an individual and collective set of receptors. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] considers the impacts on residential amenity and the users of PRoW, in addition to assessing visual impacts and considering how the project might alter views for nearby residents. The assessment concludes that significant major and moderate adverse visual effects are likely to occur during the construction, operational (years 1 and 10) and decommissioning phases for users of PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary.

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	While these changes cannot be fully mitigated, the design includes embedded screening measures to reduce visibility where possible, while additional mitigation measures include the adoption of the **oCEMP [EN010149/APP/7.7.2]**, **oLEMP [EN010149/APP/7.9.2]**. **oDEMP [EN010149/APP/7.13.2]** and the **oSMP [EN010149/APP/7.11.2].** Changes to visual amenity on PRoW will be mitigated against in the form of new hedgerow planting or structural planting belts where impacts are expected to be significant, which will result in these impacts becoming insignificant by the tenth year of operation. The Applicant also recognises that there is a substantial number of Relevant Representations from members of the public, Parish Councils and local opposition groups that cite concern about physical and mental health and wellbeing, related to a wider range of factors. The Applicant is content that receptors and health pathways, and individual environmental effects related to health and wellbeing have been appropriately considered, assessed and mitigated for (where practicable) as per the approach agreed at EIA Scoping. However, given the number of representations (noting that mental health can be affected by the clear provision and articulation of information), the position of key stakeholders and the fact that the approach to consideration of health and wellbeing is split across a number of different ES chapters, Management Plans and other documents (such as the **Equality Impact Assessment [EN010149/APP/7.18]** [APP-0151]), the Applicant considers that it would be beneficial to provide a comprehensive document that consolidates these elements in one place to demonstrate the consideration of health pathways through the submission a **Health and Wellbeing Summary Statement [EN010149/APP/8.10]** at Deadline 1.
Military interests	
The site's proximity to Ministry of Defence facilities, RAF Digby & RAF Waddington and high-powered fuel lines poses additional security risks. Any potential interference with these critical infrastructures could have broader implications for national security, which must be treated as a priority.	Prior to submission of the Application, the Applicant has engaged with the Ministry of Defence (MOD) and all utilities affected by the Proposed Development. Agreements have been set out in the draft Statement of Common Ground and through correspondence with each stakeholder. The discussions with the MOD regarding RAF Digby and other military interests within the 'Safeguarding Zones' are detailed in **Draft Statement of Common Ground - Ministry of**

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	Defence [EN010149/APP/8.7]. Security of the military interests, in relation to the presence of the Proposed Development, have not been raised as a concern in these discussions. As part of the discussions, the MOD requested certain changes to the Proposed Development, which have been accommodated. The MOD Relevant Representation [RR-278] demonstrates the key safeguards that would lead to a non-objection and ongoing discussions will ensure the Proposed Development does not adversely affect the safe and efficient operation of RAF Digby or other nearby military interests. There is one high pressure fuel line falling within the Site, which is operated by Exolum. Discussions with Exolum have informed the design of the Proposed Development, which have been detailed in the **Draft Statement of Common Ground - Exolum Pipeline System Ltd [EN010149/APP/7.25]** [APP-158]. The effect of the Proposed Development on the Exolum assets has been discussed and Protection Provisions are due to be agreed in order to adequately protect the Exolum assets.
Principle of development	
As a Parish Council, we recognize there has been some reduction in the magnitude of the Springwell Solar farm development down from the original proposal of 4200 acres to the revised 3163 acres. However, having consulted with our parishioners (Appendix 1), we are not able to support the project due to the fact it is still far too big by several factors and as we have highlighted throughout the process the significant risks it poses to the local community, environment, national food security and key MOD establishments far outweigh any perceived benefits. We ask that the inspectorate puts this into perspective, currently the largest solar installation in the UK is Shotwick in Flintshire at approximately 250 acres. The enormous scale of the proposed Springwell Solar installation magnifies the risks that we outline below. Springwell Solar will be 12.5 times the size of Shotwick.	Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*" Section 6.10 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] describes why large-scale solar is essential to support the UK to achieve Net Zero, and Para 3.15.7 states that "*To deliver the government' ambition, the equivalent of approximately one large-scale solar scheme would need to be switched on each and every month between now and 2030, between August 2024 and 2030.*"

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	The size and location of the Proposed Development have been carefully considered, balancing the need to maximise grid capacity while also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [AS-018]** sets out the reasoning for the Proposed Development, including its size and location. The Planning Balance justifies how the overwhelming national need, as demonstrated in the **Statement of Need [EN010149/APP/7.1]** [APP-0135] outweighs any potential significant adverse impacts which, as the **Environmental Statement** sets out, are limited. The substantial benefits and need for the Proposed Development as set out in Section 3 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**,** including the delivery of CNP Infrastructure to contribute towards meeting national energy objectives, outweighs the residual landscape effects when applying the planning balancing exercise to the Proposed Development with no requirement to demonstrate exceptional circumstances given that the presumption for allowing the DCO. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of Best and Most Versatile (BMV) land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm.

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	In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. The **Design Approach Document [EN010149/APP/7.3.2]** demonstrates how the Proposed Development has been developed in accordance with the criteria for good design set out and required within NPS EN-1 and NPS EN-3. It explains how the Proposed Development has been developed via an iterative design and EIA process using Project Principles to guide design related decision making. It includes details of how the design of the Proposed Development has responded to feedback raised by the MOD throughout the DCO process. Consideration of the Project Principles throughout the iterative design process has informed the spatial extent of the Order Limits which includes offsets to local settlements, dwellings, roads and PRoW. This has resulted in three distinct parcels of Solar PV development (in Springwell West, Central and East) which are responsive to the distinctive and unique local character of the Site. Solar PV development within these parcels would be further subdivided and compartmentalised by the existing framework of trees and woodlands, existing and proposed landforms and proposed tree belts and hedgerows. As a result, the mass, scale and form of the Solar PV Development and Springwell Substation would not be viewed as a continuous block of development and the 'modular' characteristics of the Proposed Development allow it to sit within the existing landscape fabric. These factors would assist to reduce the overall perceived scale of the development. Therefore while the character and appearance of the Order Limits would change from arable farmland to a utility-scale solar PV development, the Proposed Development achieves an

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	appropriate and sensitive design response that is secured by Control Documents within the **Draft DCO [EN010149/APP/3.1.2]**.
We also feel that the information being shared by the applicant is disingenuous. In the original scoping documents based on a 4200-acre site they were claiming to be able to provide up to 800MW into the national grid and provide energy for 180,000 homes. The site is now 25% smaller but they still claim the same potential import values. Is the applicant now expecting the sun to shine more due to the reduction in the size of the development?	The **Design Approach Document [EN010149/APP/7.3.2]** describes how the design of the Proposed Development has evolved via an iterative design process over three distinct stages of design (Stage 1, 2 and 3). At each stage of design, the size of the Order Limits has varied based on the information available at the time to include all land required to facilitate the Proposed Development. This includes land for construction, mitigation and cabling (by example) and is not simply a reflection of how much power will be produced. The Scoping Boundary presented at Stage 1 equated to 1,702ha (4,205 acres). This was based on the findings of the preliminary assessment and included all areas with the potential to accommodate Solar PV development, Springwell Substation, BESS, and preferred areas for mitigation and enhancement. The exact quantum of land required for each of these elements was not known at this stage and was subject to further testing and assessment at Stage 2 and 3 to refine the design. Throughout the subsequent stages of design (Stage 2 and 3), the design was reviewed and revised to take account of stakeholder feedback, emerging results from ongoing environmental surveys, environmental assessment and technical studies to determine the exact spatial extent of the land required to facilitate the Proposed Development. This resulted in the Order Limits increasing to 1,772ha (4,378 acres) at Stage 2 and decreasing to 1,280ha (2,985 acres) at Stage 3. The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010149/APP/7.2.2]** [AS-018] sets out the reasoning for the Proposed Development, including its size and location. The Proposed Development expects to require 2.4 acres for each MW of output, representing an efficient use of the land for solar PV and associated infrastructure within the range identified in paragraph 2.10.17 of NPS EN-3.

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It is very clear there are alternative options that companies such as EDF should be exploring before they materially changing the landscape in Lincolnshire. Whilst there are many potential innovations, we felt it was important to share one example. Power Roll, a developer of ultra-low cost and lightweight flexible film for energy generation and storage, have concluded that commercial roof space can easily support the levels of solar PV required to meet the UK's net-zero targets – without putting further pressure on greenfield sites. Power Roll's analysis shows that there are around 2.5 billion square meters of south-facing commercial roof space in the UK, which could support over 400 GW of solar power; well in excess of the latest estimates of the capacity required to deliver net zero. If the Springwell Solar complex was consented to, the loss of this extremely fertile, irrigated land will have long-term consequences, particularly at a time when the UK needs to prioritize its self-sufficiency in food supply. The various stakeholders in this application, Blankney Estates, EDF Renewables UK and Luminous Energy cloak this application in Net Zero rhetoric. The community of Scopwick & Kirkby Green should not be sacrificed for the commercial benefits of the applicant and the estate that is proposing to lease the land.	Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*" The Applicant is seeking for a time limited 40 year consent, therefore, the Proposed Development will be decommissioned after an operational period of 40 years and would not permanently change the landscape in Lincolnshire. Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3.

Table 3-13: Scopwick and Kirkby Green Solar Action Group

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BESS	
The Lithium-ion batteries used in these battery storage systems can fail by "thermal runaway" where overheating in a single faulty cell can propagate to neighbouring cells and the energy released results in what is popularly known as a "battery fire". These are not strictly "fires" at all, requiring no oxygen to propagate. They are uncontrollable except by extravagant water cooling. Lithium itself is a highly reactive element like Sodium or Potassium. It reacts with water giving off Hydrogen gas.	The Applicant has applied industry best practice to the design of the BESS (Battery Energy Storage System), including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems". The Applicant is engaging with the UK Health Security Agency on the subject of thermal runaway and details can be found in the **Statement of Common Ground – UK Health Security Agency [EN010149/APP/8.6].** Due to all of these points, there is no useful comparison to be drawn with household or EV battery installations. The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the **oBSMP [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** These documents set out the very low likelihood of such an event (1 in 7700 years), an aggregate figure which accounts for all example BESS enclosures within the compound) along with the worst case impacts that could occur. The Applicant has stringent procurement processes in place to ensure high quality and tested equipment is used on the Proposed Development. Appropriate standards such as UL 9540A are used to ensure risks from thermal runaway is minimised. The chemical reactions within the BESS container under a thermal runaway event are described within the **BESS Plume Assessment [EN010149/APP/7.19.2].** Lincolnshire Fire and Rescue Service (FRS) would respond to any BESS event according to a mutually agreed Emergency Response Plan (see **oBSMP [EN010149/APP/7.14.2])**, which further reduces risk. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS OEMs advise that hose streams should not be directly discharged on BESS battery systems because this can significantly prolong a BESS failure event. A defensive tactic known as boundary cooling is used, which typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. This also ensures that water usage and environmental pollution risks are minimised.

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Biodiversity	
There are many natural springs within the proposed Springwell Solar Farm, hence the name, where clear ground water reaches the surface. Some but not all of these are within the Beck at Scopwick. Any pollution from broken panels will end up in these biologically diverse water courses.	The Solar PV modules will be subject to regular maintenance throughout the operational phase and any broken modules would be replaced as soon as possible. Pollution prevention measures would mitigate risk of pollution, such as potential for dust deposition during construction, as documented in and secured in the **oCEMP [EN10149/APP/7.7.2]**. The embedded design includes a minimum of 6m buffer to be maintained from ponds and ditches , as secured in the **Design Commitments [EN10149/APP/7.4]** [APP-0138]. **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] details the proposed outline drainage strategy for the scheme. Any precipitation falling on each Solar PV Module will runoff the panels and flow towards / infiltrate in the rain shadow of the down-slope modules. This feature will enable the use of the rain shadow area of the panels to maintain the infiltration potential of the site. Any land drainage systems damaged as part of the development (through piling or other construction methods) will either be reinstated or diverted with equivalent drainage systems, to ensure no lasting changes compared to the baseline. This is secured in the **Outline Construction Environmental Management Plan** (oCEMP) **[EN010149/APP/7.7.2].** A surface water drainage system will be developed as part of the development, this will capture and manage any additional run off from the site and ensure that pre development run off is maintained with no additional flows entering Scopwick Beck or any other watercourse. A piling risk assessment will be completed to address any potential risks associated with the proposed foundations, with updates to these structures accommodated into the design prior to construction.
There are many aquatic insects within the parish BSG-Ecology funded research on the potential impacts of ground mounted photovoltaic solar panels, found that aquatic invertebrates mistake the panels for water and lay eggs on the panel surfaces instead of an aquatic environment. This is because they respond to horizontal polarised light which are both emitted by water and solar panels. The proposed Springwell Solar farm has 5 ponds and many dykes within its boundaries and	The limited research available in relation to solar farms and aquatic invertebrates suggests there may be an attraction from solar PV modules to aquatic invertebrates due to the reflection of polarised light. However modern solar PV modules, such as will be used at Springwell are designed to absorb as much light as possible and are typically coated with an anti-reflective film to help reduce this type of potential effect. **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** outlines the survey work and assessment carried out to inform the Proposed Development, and no extensive aquatic habitats likely to support a diverse assemblage of aquatic insects were identified on Site and no

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several very close streams and water courses. All research carried out advises set panels away from areas of fresh water and only uses small areas of panels.	designated sites identified for their aquatic invertebrates are located in close proximity to the Proposed Development. In addition, 6m buffers would be maintained from existing watercourses and an appropriate buffer from the ponds present to help reduce any such effect, as secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138]**.** No significant impacts on aquatic invertebrates were identified in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2].**
Higher bird mortalities in larger solar farms have been reported in scientific papers. The larger the area of development, the more impact on the wildlife in general. Montag et al studied the indirect effects of solar farms including habitat loss. They discovered most ground nest birds such as Skylarks avoided solar farms in a study that covered 11 UK Solar Farms. It was thought they used the fields away from the Solar Farm in preference as they need an unbroken line of sight. There are many Skylarks (UK Red List) within the boundaries and surrounding areas of Springwell's proposed borders. DeVault et al demonstrated that solar farms can alter the structure of bird communities.	It is acknowledged that the breeding bird assemblage at Springwell is of conservation importance supporting a number of farmland species such as skylark that have undergone recent population declines. Specific mitigation measures have been proposed including over 100ha of grassland without Solar PV modules thereby providing unbroken sightlines on at least one side to enable the continued breeding of ground nesting species. In addition, the provision of a source of winter seed and enhancement of habitats underneath the panels will increase insect biomass locally which is the food source required during the breeding season. **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** did not identify any significant impacts in relation to breeding birds. The **oLEMP [EN10149/APP/7.9.2]** sets out how, through the mitigation described above, habitats will be created and managed during the construction and operation of the Proposed Development and will deliver benefits for nesting birds. To date, there is not a lot of research on the impact of solar farms on birds and what research there can be inconclusive or contradictory. Most of the studies concerning solar impacts on birds are from the US from large concentrated solar systems, or heliostats, where bird mortalities caused by collision or singing have been reported. In general, these studies refer to solar PV modules in dessert or savanna habitat and are not directly comparable with the UK. Modern solar PV modules are designed to absorb as much light as possible and are typically coated with an anti-reflective film to help reduce this type of effect**.** The majority of reports of bird mortality on solar farms suggest that collisions with infrastructure such as transmission lines may be more important than direct collisions with solar panels (e.g. Harrison et al., 2016; Kagan et al., 2014). Walston et al. (2016) concluded that passerine species were most at risk but using empirical data on bird collisions from a range of studies they estimated that overall mortality related to solar installations was likely to be negligible compared

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	to other anthropogenic causes of death (e.g. wind turbines, power plants, other infrastructure and collision with road traffic). Some concern has been expressed that birds might collide with solar panels if they were to mistake them for waterbodies, a phenomenon sometimes referred to as the 'lake effect' (Kagan et al., 2014). It might be expected that such an effect would pose the greatest risk to migratory waterbirds and although a relatively high proportion of 'water-dependent' species were amongst the collision fatalities recorded at one large solar installation (Kagan et al., 2014) there is no evidence to directly support the 'lake effect' (Kosciuch et al., 2020). An evidence review of the impact of solar farms on birds in the UK suggests that the collision risk presented by Solar PV Modules to birds is low (*Hanson et al 2017*), whilst a recent study (Copping *et al,* February 2025) published after Application submission, found that solar farms in south of England can host up to three times as many birds as arable land, with appropriate management.
Springwell's report recorded a high diversity of bat species across the proposed development area, and at least 10 of the 12 species of bats found in Lincolnshire were in considerable numbers.	**ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** has acknowledged that the foraging bat assemblage at Springwell is of conservation importance. Survey work, including targeted surveys of hedgerows which are to be affected by works - as detailed in **ES Volume 3, Appendix 7.13: Further Targeted Bat Surveys [EN010149/APP/6.3]** [APP-094] have identified that hedgerows across the site are important flight corridors for a variety of bat species, including the rare barbastelle bat. Specific mitigation measures have been outlined, including retention of all woodland and the majority of hedgerows used by foraging bats. Where small sections of hedgerow need to be removed to facilitate cable installation and access, mitigation measures will be put in place to maintain the physical linear structure of key hedgerows, during the hours of darkness, until the removed sections are reinstated. The assessment on bats is detailed in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** which concludes that there would be no significant adverse residual effect. The **oLEMP [EN10149/APP/7.9.2]** states that over 15km of new hedgerow and 16ha of new tree belts will be planted increasing the foraging resource and connectivity for commuting bats across the site. This together with grassland and field margin habitat creation and enhancement (as outlined for breeding birds) will increase the availability of insect prey for bats.

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	Lighting will be designed in accordance with guidelines issued by the Bat Conservation Trust to reduce impacts on bats and other nocturnal species. These measures are secured by the detailed LEMP via Requirement 8 of the **Draft DCO [EN010149/APP/3.1.2]**. The **oLEMP [EN10149/APP/7.9.2]** sets out how habitats will be created and managed during the construction and operation of the proposed scheme delivering benefits for foraging bats. Bat activity surveys will also be carried outpost construction to monitor the effects of the Proposed Development and biodiversity enhancement measures to inform management and provide an evidence research base.
Natural England's report also stated that all fencing should be 20-30 cm off the ground so that mammals such as mice, voles, hares etc can move freely across the area, to help prevent population fragmentation. Springwell's action plan only stated leaving mammal gates ie. Gaps, and they also did not say how often they would be. This is not sufficient.	Requirement 9 of the **Draft DCO [EN010149/APP/3.1.2]** secures the details of fencing and other means of enclosure and will require approval by the relevant planning authority before any authorised development can commence. Fences would have clearances above ground to permit the passage of smaller wildlife such as brown hares, hedgehogs and mice into areas where there are Solar PV Modules, as well as installation of 'two-way mammal gates' for larger mammals such as badgers. This is embedded in the design, which is documented and secured in the **Design Commitments [EN10149/APP/7.4]** [[APP-0138]. Preconstruction surveys will be undertaken to confirm the extent and distribution of badger activity, and this information will be used to inform the location of mammal gates. Finally, the fencing will be monitored during operation to ensure no wildlife gets caught up in the fencing.
Flood risk and drainage	
We wish to comment on the inadequacy of the flood risk mitigation that has been submitted with the Springwell application. The land north of Trundle Lane in the parishes of Blankney and Scopwick, all have the benefit of tile under draining infrastructure which outfalls into ditches that find their way downhill culverted under the B1191 and discharge into Scopwick Beck.	Any land drainage systems damaged as part of the development (through piling or other construction methods) will either be reinstated or diverted with equivalent drainage systems, to ensure no lasting changes compared to the baseline. This is secured in the **Outline Construction Environmental Management Plan** (oCEMP) **[EN010149/APP/7.7.2].** A surface water drainage system will be developed as part of the development, this will capture and manage any additional run off from the site and ensure that pre development (QBAR greenfield) run off is maintained with no additional flows entering Scopwick Beck or any other watercourse. The retention of flows to QBAR greenfield rates will result in a reduced peak flow from current natural runoff from the site during extreme rainfall events, offering a reduction in offsite flows for all rainfall events in excess of the QBAR (approx. 1 in 2 year) event. Excess flows will be

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	retained on site in suitably designed SuDs attenuation features in line with the latest relevant guidance on SuDS. SuDS based systems work by mimicking natural drainage regimes, SuDS aim to reduce surface water flooding, improve water quality and enhance the amenity and biodiversity value of the environment. SuDS achieve this by lowering flow rates, increasing water storage capacity and reducing the transport of pollution to the water environment. **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] details the proposed outline drainage strategy for the scheme.
General – decommissioning	
It is essential that a full Decommissioning and Reclamation Bond * is in place to remediate these lands back to its pre-development state at the end of the 40 years term.	The **oDEMP [EN010149/APP/7.13.2]** sets out the framework for how decommissioning will take place. The Applicant will be subject to obligations in the **Draft DCO [EN010149/APP/3.1.2],** including to comply with Requirement 19, which sets out that Applicant must decommission the Proposed Development in accordance with sub-paragraph (1), and that no decommissioning works can take place until the local planning authority has approved the detailed Decommissioning Environmental Management Plan, which must be substantially in accordance with the oDEMP. The requirements of the DCO are enforceable and it is a criminal offence to fail to comply with a DCO. The Proceeds of Crime Act 2002 also acts as a further deterrent, and elements of the installed solar PV represent a valuable asset meaning it would be in Applicant's interest financially to decommission the site in order to sell or recycle the panels and other components. If the undertaker went into liquidation or receivership, its assets would be sold off to fund the decommissioning of the Scheme that is required pursuant to the legal requirement of the DCO (in this context, it is relevant that the DCO is a piece of legislation, and therefore different to a planning permission). A decommissioning bond is not routine for energy DCOs and have not been required by the Secretary of State in its previous decisions to grant consent for other solar NSIPs. The Applicant will follow good commercial practice and ensure that it has funds set aside to decommission the Proposed Development in accordance with Requirement 19 and, as the enforcement provisions under the statutory framework are already rigorous, there is no need to include a decommissioning bond in addition to the provisions of the **Draft DCO [EN010149/APP/3.1.2]**.

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Health	
The scoping issue in respect of Health (see ID 235 S 5.6 Human Health P10) is insufficiently covered by the Secretary of State's response. Whereas the scoping process does cover certain aspects relating to Health such as air quality, it has nothing to say about the interaction of Nature on human health and wellbeing, not to mention mental health. Particular concern is raised relating to the Project's effects on experience of the natural environment relating to visual amenity, experience of recreational routes, noise and ecology, and the impact on mental health and wellbeing.	At an early stage, the Project advised of its intention to consider effects on human health through individual topic chapters within the EIA. The Scoping Opinion received from PINS (on behalf of the Secretary of State, see **ES Volume 3, Appendix 5.2: Scoping Opinion [EN010149/APP/6.3]** [APP-076]), as well as LCC and NKDC confirmed that this approach was acceptable on the basis that the ES should clearly set out potential impacts on human health from the Proposed Development during construction, operation and decommissioning and cross-references are made to where impacts are considered and assessed within other relevant topic chapters of **ES Volume 1.** In **ES Volume 3, Appendix 5.3: Scoping Opinion Response Matrix [EN010149/APP/6.3]** [APP-077], the Applicant set out that consideration of impacts upon human health as a result of the Proposed Development are covered through the findings of other assessments undertaken as part of the EIA, such as air quality, landscape and visual, noise and vibration and traffic and transport Reference to environmental impacts on health and wellbeing is provided in Table 5.2 of **ES Volume 1, Chapter 5: Approach to the EIA [EN010149/APP/6.1]** [APP-045], and from paragraph 8.1.38 to 8.1.47 in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]. The Applicant also recognises that there is a substantial number of Relevant Representations from members of the public, Parish Councils and local opposition groups that cite concern about physical and mental health and wellbeing, related to a wider range of factors. The Applicant is content that receptors and health pathways, and individual environmental effects related to health and wellbeing have been appropriately considered, assessed and mitigated for (where practicable) as per the approach agreed at EIA Scoping. However, given the number of representations (noting that mental health can be affected by the clear provision and articulation of information), the position of key stakeholders and the fact that the approach to consideration of health and wellbeing is split across a number of different ES chapters, Management Plans and other documents (such as the **Equality Impact Assessment [EN010149/APP/7.18]** [APP-0151]), the Applicant considers that it would be beneficial to provide a comprehensive document that consolidates these elements in one place to demonstrate the

Summary Position of Interested Party Scopwick and Kirkby Green Solar Action Group [RR-370]	Applicant Response
	consideration of health pathways through the submission a **Health and Wellbeing Summary Statement [EN010149/APP/8.10]** at Deadline 1.
Land contamination	
The potential damage the Springwell Solar Farm will have on the Fragile Soils on the Lincoln Heathland.	The potential damage to soils has been assessed within **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]**. Methods for preserving soils in terms of the physical and chemical properties of soil are discussed in further detail below within this table related to Land use. This response addresses the protection of soils from damage by contamination. Consideration of the activities that could result in contamination of soil is provided in **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]**, with activities during the construction, operation and decommissioning phases that could result in adverse impacts including leaks or spillages of fuel or chemicals, accidental mobilisation of unknown existing contamination, and the potential for release of firewater. Proposed mitigation measures, that will be secured by the **oCEMP [EN010149/APP/7.7.2], oOEMP [EN010149/APP/7.10.2]**, and **oDEMP [EN010149/APP/7.13.2]** include: • completing site investigation work to assess if there is any existing contamination on-site that requires remediation; • measures to prevent disturbance of existing contamination; • emergency procedures to manage accidental spillages and leaks, in order to minimise any risk to the soil; and • measures to manage firewater associated with the BESS. These measures are secured by the **Draft DCO [EN010149/APP/3.1.2]**. When these mitigation measures are applied, potential damage to sensitive soil resources as a result of impacts from contamination are assessed to be unlikely to occur.
The effect the proposed Springwell Solar Farm development will have on The Lincoln Heath Soils and the Lincolnshire Limestone Aquifer.	The potential for land and groundwater to be adversely impacted by the development has been considered in detail by the assessment that has been undertaken in **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]**, which includes assessment of the principal aquifer present in the Lincolnshire Limestone geological unit, and the soils present across the Order Limits. This considered the sensitivity of the land, soil and groundwater at the moment, and then identified works during construction, operation or decommissioning that could

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cause pollution to occur. Mitigation measures to prevent pollution were then included in the management plans for the three phases of the Proposed Development.

For the site, the groundwater receptors are assigned high sensitivity in some areas (where there is a principal aquifer (such as the aquifer within the Lincolnshire Limestone geological unit) and a groundwater source protection zone), and in other locations the groundwater sensitivity is medium or low. Due to the robust mitigation measures that are included in management plans for all three phases of proposed development, the potential impact on groundwater when mitigation measures are in place is assigned a significance of low adverse.
This means that the residual effect on the groundwater receptors (of all sensitivity levels) is not expected to be significant due to the measures that will be in place to protect the receptor.

Proposed mitigation measures, that will be secured by the **oCEMP [EN010149/APP/7.7.2], oOEMP [EN010149/APP/7.10.2]**, and **oDEMP [EN010149/APP/7.13.2]** include:

- completing site investigation work to assess if there is any existing contamination on-site that requires remediation;
- measures to prevent disturbance of existing contamination;
- emergency procedures to manage accidental spillages and leaks, in order to minimise any risk to the soil; and
- measures to manage firewater associated with the BESS.

Firewater from BESS firefighting will be collected on-site, as secured by the **oOEMP [EN010149/APP/7.10.2]** and **oDEMP [EN010149/APP/7.13.2]**. Therefore any contaminants present within this water would not be released to the environment, and would not be able to leach into the groundwater.

Runoff from construction areas will be managed during works by the **oCEMP [EN010149/APP/7.7.2]** and will not be released directly to the soil/groundwater. This will ensure that there is no accidental release of contaminants from working areas into the wider environment. Any runoff from solar panels will be a result of rainwater only, so this can be safely released to the underlying soil without any adverse impacts on soil or groundwater.

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Land use	
Concerns about loss of agricultural land for food production.	The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of BMV land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The Applicant has sought to reduce impacts on BMV land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. This has influenced both the initial site selection process and the subsequent design evolution of the Proposed Development. This includes retaining fields for arable production that comprise solely of Grade 1 or 2 land. It would not be possible to advance with this project without the use of some BMV land, and the Applicant has provided further justification for this, as referenced in Section 11.9 of **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** and within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.** In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV

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	agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. The Proposed Development will result in the temporary use of some higher grade (BMV) agricultural land for solar development, cabling, access tracks and green infrastructure, together with some permanent use for green infrastructure only. The amount of BMV agricultural land used has been minimised through the site selection and design development process as outlined in **ES Volume 1, Chapter 4: Reasonable Alternative Considered [EN010149/APP/6.1]** [APP-044]; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely. As set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] at paragraph 8.8.15 onwards, out of the 1280ha of land within the Order Limits, 231.7ha is BMV, which is proposed to be utilised for hard infrastructure, i.e. collector compounds, Springwell Substation, Solar PV development, and BESS. A further 77ha is proposed to be used for Green Infrastructure, with the remainder (232.5ha) required for the installation of cabling, which will be available for agricultural use once the cable has been installed. The area of BMV agricultural land, which will therefore be unable to be farmed while the development is in place (up to 40 years) therefore represents approximately 24% of the Order Limits. This increases to 42% if the area to be temporarily out of use while the cable is being laid is included.
Landscape and visual impacts – glint and glare	
The impact of solar panels has yet to be fully addressed in the close proximity of Hill Farm airfield. The issue with reflection, glint and glare the approaches are purely visual and for light aircraft , microlight, ultralight and Paramotors is critical on take-off and landing.	NPS EN-3 states that 'whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety'. Glint and glare impacts upon aviation activity associated with Hill Top Farm Airfield have been assessed within **ES Volume 3, Appendix 5.4: Glint and Glare Study [EN010149/APP/6.3.2]** which considers specific receptors defined by the airfield owner, including final approaches and two circuits. The assessment concludes that instances of glare with intensities greater than the acceptable

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Solar glint and glare from photovoltaic panels can significantly impact wildlife, particularly birds and insects as shown above.	intensities (in accordance with the guidance for licensed aerodromes and industry best practice) could be operationally accommodated for due to these instances occurring in the early hours of the morning and views of reflecting panels coinciding with the sun; a far greater source of light. **Aquatic invertebrates** The limited research available in relation to solar farms and aquatic invertebrates suggests there may be an attraction from solar PV modules to aquatic invertebrates due to the reflection of polarised light. However modern solar PV modules, such as will be used at Springwell are designed to absorb as much light as possible and are typically coated with an anti-reflective film to help reduce this type of potential effect. **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** outlines the survey work and assessment carried out to inform the Proposed Development, and no extensive aquatic habitats likely to support a diverse assemblage of aquatic insects were identified on Site and no designated sites identified for their aquatic invertebrates are located in close proximity to the Proposed Development. In addition, 6m buffers would be maintained from existing watercourses and an appropriate buffer from the ponds present to help reduce any such effect, as secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138]**.** No significant impacts on aquatic invertebrates were identified in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2].** **Birds** It is acknowledged that the breeding bird assemblage at Springwell is of conservation importance supporting a number of farmland species such as skylark that have undergone recent population declines. Specific mitigation measures have been proposed including over 100ha of grassland without Solar PV modules thereby providing unbroken sightlines on at least one side to enable the continued breeding of ground nesting species. In addition, the provision of a source of winter seed and enhancement of habitats underneath the panels will increase insect biomass locally which is the food source required during the breeding season. **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** did not identify any significant impacts in relation to breeding birds. The **oLEMP [EN10149/APP/7.9.2]** sets out how, through the mitigation described above, habitats will be created and managed during the construction and operation of the Proposed Development will deliver benefits for nesting birds.

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Collision with infrastructure on solar farms has been reported as a cause of mortality in birds, including endangered species (Penniman & Duffy, 2021), although the frequency of such incidents varies amongst sites (e.g. Kagan et al., 2014; Visser et al., 2019; Kosciuth et al., 2020), with one UK study finding no evidence of bird mortalities from solar panels (Feltwell, 2013).

To date, there is not a lot of research on the impact of solar farms on birds and what research there can be inconclusive or contradictory. Most of the studies concerning solar impacts on birds are from the US from large concentrated solar systems, or heliostats, where bird mortalities caused by collision have been reported. In general, studies refer to PV panel in desert or savanna habitat and are not directly comparable with the UK. Modern Solar PV Modules are designed to absorb as much light as possible and are typically coated with an anti-reflective film to help reduce this type of effect**.**

The majority of reports of bird mortality on solar farms suggest that collisions with infrastructure such as transmission lines may be more important than direct collisions with solar panels (e.g. Harrison et al., 2016; Kagan et al., 2014). Walston et al. (2016) concluded that passerine species were most at risk but using empirical data on bird collisions from a range of studies they estimated that overall mortality related to solar installations was likely to be negligible compared toother anthropogenic causes of death (e.g. wind turbines, power plants, other infrastructure and collision with road traffic).

Some concern has been expressed that birds might collide with solar panels if they were to mistake them for waterbodies, a phenomenon sometimes referred to as the ‘lake effect’ (Kagan et al., 2014). It might be expected that such an effect would pose the greatest risk to migratory waterbirds and although a relatively high proportion of ‘water-dependent’ species were amongst the collision fatalities recorded at one large solar installation (Kagan et al., 2014) there is no evidence to directly support the ‘lake effect’ (Kosciuch et al., 2020).

An evidence review of the impact of solar farms on birds in the UK suggests that the collision risk presented by Solar PV Modules to birds is low (*Hanson et al 2017*). The greatest impact on birds is considered likely to be through land use change and potential habitat loss for breeding and

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	foraging, as shown in the wider land use change research (Wilson *et al.* 2009, Rigal *et al.* 2023). A recent study (Copping *et al,* February 2025), published after Application submission, found that solar farms in south of England can host up to three times as many birds as arable land, with appropriate management.
Noise	
We are also concerned about the noise emissions from the inverters with the continual level of audible noise being above 40db at 800m distance. We do hope that noise levels will be addressed and mitigated in this proposed scheme.	An assessment of noise effects from the operational phase is provided in **ES Volume 1, Chapter 12: Noise and Vibration [EN010149/APP/6.1]** [APP-052]. Rated noise levels from all proposed plant items operating at 100% capacity during both daytime and night-time periods comply with the most restrictive adopted noise criteria of 35 dB L_{Ar} at all the nearest sensitive receptors considered. The alleged 40 dB emission noise level at 800 metres is not accurate and is not representative of the predicted site noise. The noise criteria were agreed through consultation with North Kesteven District Council and secured in Requirement 15 of the **Draft DCO [EN010149/APP/3.1.2]**. The assessment concludes that the effects from noise is not significant following adoption of the mitigation measures as outlined in the **Design Commitments [EN10149/APP/7.4]** [APP-0138]. The design considerations pertinent to noise include a 4 metre barrier surrounding the BESS compound, 6 metre barrier positioned around the west, north and eastern faces of the Springwell transformers, offset distances of at least 250 metres from residential properties for the Springwell Substation, BESS, Collector Compounds, Standalone Inverter, Transformer and Switchgear and ITS.

Table 3-14: Springwell Solar Action Group

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General position	
The action group is alarmed about this development on several key aspects, Agricultural land loss, flood risk, fire and contamination, health and well-being, access to the unspoilt countryside, impact on local properties.	The Applicant has developed the design of the Proposed Development to provide a sensitive response to the local environment and reduce potential impacts in accordance with the Project Principles set out in the **Design Approach Document [EN010149/APP/7.3.2]**. This includes Project Principles in relation to agricultural land (Principles 8.1-8.3), flood risk (Principles 7.1-7.2), access to the countryside (Principles 5.1-5.4) and local settlements and dwellings (Principle 1.2). Section 5 (Design Evolution) of the **Design Approach Document [EN010149/APP/7.3.2]** explains how the Project Principles have been used to guide decision making throughout the evolution of the Proposed Development. Section 6 demonstrates how the Project Principles manifest themselves as tangible outputs in the Proposed Development that will be secured by Control Documents in the **Draft DCO [EN010149/APP/3.1.2]**. Further information on the specific comments raised is provided as follows: **Agricultural land loss** The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of BMV land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were

Summary Position of Interested Party Springwell Solar Action Group [RR-383]	Applicant Response
	a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The Applicant has sought to reduce impacts on BMV land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. This has influenced both the initial site selection process and the subsequent design evolution of the Proposed Development. This includes retaining fields for arable production that comprise solely of Grade 1 or 2 land. It would not be possible to advance with this project without the use of some BMV land, and the Applicant has provided further justification for this, as referenced in Section 11.9 of **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** and within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.** In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. The Proposed Development will result in the temporary use of some higher grade (BMV) agricultural land for solar development, cabling, access tracks and green infrastructure, together with some permanent use for green infrastructure only. The amount of BMV agricultural land used has been minimised through the site selection and design development process as outlined in **ES Volume 1, Chapter 4: Reasonable Alternative Considered [EN010149/APP/6.1]** [APP-044]; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely.

Summary Position of Interested Party Springwell Solar Action Group [RR-383]	Applicant Response
	As set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] at paragraph 8.8.15 onwards, out of the 1280ha of land within the Order Limits, 231.7ha is BMV, which is proposed to be utilised for hard infrastructure, i.e. collector compounds, Springwell Substation, Solar PV development, and BESS. A further 77ha is proposed to be used for Green Infrastructure, with the remainder (232.5ha) required for the installation of cabling, which will be available for agricultural use once the cable has been installed. The area of BMV agricultural land, which will therefore be unable to be farmed while the development is in place (up to 40 years) therefore represents approximately 24% of the Order Limits. This increases to 42% if the area to be temporarily out of use while the cable is being laid is included. **Flood risk** The **Flood Risk Assessment [EN010149/APP/7.16.2]** [AS-016] assesses the flood risk to the Proposed Development and concludes that the EA's flood map for planning shows that the majority of the site is located within Flood Zone 1, which represents a 1 in 1000 year or less annual probability of flooding from fluvial sources. Though some areas of the Solar PV modules within Springwell East are within Flood Zone 2 and Flood Zone 3 as outlined in Figure B.2 of the **Flood Risk Assessment [EN010149/APP/ 7.16.2]** [AS-016] the Solar PV models are not anticipated to disrupt the flooding pathways overland, therefore the extents of the Flood Zones will remain the same once the Solar PV modules are erected. For areas within the fluvial floodplain, only Solar PV modules will be placed there. These panels have been designed to be elevated 1m above ground level and there will be negligible loss of floodplain as a result of the stands supporting the solar PV modules. There are no ground raising requirements in the areas of solar PV modules. Therefore, floodplain compensation is not required. The Springwell Substation, BESS, ITS and Outdoor Equipment (transformer, switchgear and central inverters) and Collector Compounds will be located in Flood Zone 1, as secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138] and by Requirement 5 in the **Draft DCO [EN010149/APP/3.1.2]**. The key elements of proposed vulnerable infrastructure i.e. Springwell

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	Substation and BESS units will be placed in the northwestern region of the Site where the flood risk from all sources is considered to be 'very low'. This area is a significant distance from the area of Flood Zone 2 and 3 and is considered to remain safe even in the extreme climate change scenario as outlined further in the **Flood Risk Assessment [EN010149/APP/7.16.2]** [AS-016]. Engagement has held with the Environment Agency on these matters, as detailed in **ES Volume 1, Chapter 15: Water [EN010149/APP/6.1]** [APP-055] and in the **Draft Statement of Common Ground – Environment Agency [EN010149/APP/8.5]**. **Impact on local properties** The Applicant has sought to limit impacts on properties close to the Proposed Development in accordance with the Project Principles set out in the **Design Approach Document [EN010149/APP/7.3.2].** This includes the provision of appropriate offsets to local settlements and dwellings on a case-by-case basis (Principle 1.2) and maintaining the rural separation between local villages (Principle 2.3). An appraisal of visual effects on residential properties close to the Proposed Development is presented in **ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3]** [APP-111]. In total, it has been assessed that the residents of 25 dwellings would experience significant visual effects during year 1. Still, in most cases, by year 10, these effects would reduce in magnitude due to the establishment of mitigation and by year 10, they would not be significant. No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. Following the Phase Two Consultation, the Applicant refined the development boundary, removing 68 Category 1 and 2 persons and all 154 Category 3 persons initially identified. After diligent inquiry, the Applicant does not consider there to be any remaining Category 3 persons. However, should any parties consider that their property has decreased in value as a direct result of the physical

Summary Position of Interested Party Springwell Solar Action Group [RR-383]	Applicant Response
	impacts from the operation of the Proposed Development, such as noise and vibration, they may be eligible to claim for compensation under Part 1 of the Land Compensation Act 1973. **Fire and contamination** The Applicant has applied industry best practice to the design of the BESS (Battery Energy Storage System), including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems". The Applicant is engaging with the UK Health Security Agency on the subject of thermal runaway and details can be found in the **Statement of Common Ground – UK Health Security Agency [EN010149/APP/8.6].** The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the **Outline Battery Safety Management Plan (oBSMP) [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** These documents set out the very low likelihood of such an event (1 in 7700 years), an aggregate figure which accounts for all example BESS enclosures within the compound) along with the worst case impacts that could occur. The **BESS Plume Assessment [EN010149/APP/7.19.2]** demonstrates that should a thermal runaway event occur, it would not pose significant risks to nearby human health receptors, including the closest residential receptors to the proposed BESS compound (approx. 440m to the southeast). In the very unlikely event that harmful impacts could occur, harmful impacts are predicted to only occur within tens of metres rather than hundreds of metres from the specific BESS enclosure involved in any thermal runaway event. Due to the typical weather conditions at the Order Limits, the smoke plume would likely be less than 6m in width. Higher wind speeds typically disperse external flaming from a BESS enclosure, shortening flame length and diluting the resultant smoke plume ensuring fire emission impairment distances are reduced. It should also be noted that the modelled plume remained well formed and showed a gradual rise and dilution as it moved downwind, reducing the risk to people at ground level. The indicative design of the BESS enclosure and site layout follows guidance to lay assets out in a manner that limits the ability for a thermal runaway event to spread to adjacent enclosures or significantly impact the local community. Lincolnshire Fire and Rescue Service would respond to

Summary Position of Interested Party Springwell Solar Action Group [RR-383]	Applicant Response
	any BESS event according to a mutually agreed Emergency Response Plan secured in the **oBSMP [EN010149/APP/7.14.2]** which further reduces risk. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS Original Equipment Manufacturers advise that hose streams should not be directly discharged on BESS battery systems because this can significantly prolong a BESS failure event. A defensive tactic known as boundary cooling is used, which typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. This also ensures that water usage and environmental pollution risks are minimised. Generally, as demonstrated during a range of recent BESS full scale burn testing and real world incidents, total BESS burn out times would typically be defined as 5 to 10 hours for battery systems operating at a high state of charge. Burn out times can be longer, such as 12 hours, where the length of the burn may be extended due to the BESS operating at a low state of charge when the thermal event occurred. As stipulated in the **oBSMP [EN010149/APP/7.14.2]** the BESS Compound would be designed to integrate fire hydrants with water delivered from static water tanks (a pump driven system) for firefighting, depending on available water supply and in accordance with NFCC Guidance. Water provision will be designated for the cooling of adjacent BESS and ancillary equipment. The **oBSMP [EN010149/APP/7.14.2]** and **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. They also set out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors. The Applicant has engaged with Lincolnshire FRS throughout the pre-application period, with ongoing dialogue on suitable preventative measures and response to any thermal runaway event. Comments received from the Lincolnshire FRS have been incorporated into the design of the BESS compound, **oBSMP [EN010149/APP/7.14.2]** and the **BESS Plume Assessment [EN010149/APP/7.19.2].** Part of the mitigations discussed and agreed with Lincolnshire FRS relate to the potential need for water to cool adjacent enclosures in the event of a fire. If required, the BESS compound can accommodate sufficient water storage over and above the minimum currently required under NFCC guidance. Appropriate measures would be agreed with the Lincolnshire FRS during the detailed design stage.

Summary Position of Interested Party Springwell Solar Action Group [RR-383]	Applicant Response
	Health and wellbeing The Applicant recognises that changes to the visual environment can impact upon mental health and wellbeing of residents. It is also acknowledged that assigning an effect on personal perception of the landscape and its mental health and wellbeing value is dependent on subjective interpretation of the landscape as a whole and of individual views by an individual and collective set of receptors. The Applicant is proposing several enhancements as part of the Proposed Development to improve health and wellbeing, these include the enhancement of PRoWs and permissive paths, provision of a community growing area, a community fund and creating direct and indirect effects associated with employment, skills and education asset out in the **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153]. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] considers the impacts on residential amenity and the users of PRoW, in addition to assessing visual impacts and considering how the project might alter views for nearby residents. The assessment concludes that significant major and moderate adverse visual effects are likely to occur during the construction, operational (years 1 and 10) and decommissioning phases for users of PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary. While these changes cannot be fully mitigated to reduce all residual effects, the design includes embedded screening measures to reduce visibility where possible, while additional mitigation measures include the adoption of the **oCEMP [EN010149/APP/7.7.2]**, **oLEMP [EN10149/APP/7.9.2]**, **oSMP [EN010149/APP/7.11.2]** and the **oDEMP [EN010149/APP/7.13.2].** Changes to visual amenity on PRoW will be mitigated against in the form of new hedgerow planting or structural planting belts where impacts are expected to be significant, which will result in these impacts becoming not significant by the tenth year of operation. The Applicant also recognises that there is a substantial number of Relevant Representations from members of the public, Parish Councils and local opposition groups that cite concern about

Summary Position of Interested Party Springwell Solar Action Group [RR-383]	Applicant Response
	physical and mental health and wellbeing, related to a wider range of factors. The Applicant is content that receptors and health pathways, and individual environmental effects related to health and wellbeing have been appropriately considered, assessed and mitigated for (where practicable) as per the approach agreed at EIA Scoping. However, given the number of representations (noting that mental health can be affected by the clear provision and articulation of information), the position of key stakeholders and the fact that the approach to consideration of health and wellbeing is split across a number of different ES chapters, Management Plans and other documents (such as the **Equality Impact Assessment [EN010149/APP/7.18]** [APP-0151]), the Applicant considers that it would be beneficial to provide a comprehensive document that consolidates these elements in one place to demonstrate the consideration of health pathways through the submission a **Health and Wellbeing Summary Statement [EN010149/APP/8.10]** at Deadline 1.

Table 3-15: Welbourn Parish Council

Summary Position of Interested Party Welbourn Parish Council [RR-440]	Applicant Response
General position	
A questionnaire was distributed to all households in Welbourn in June 2024 concerning the proposed solar farm developments. It revealed the following: - Of those who responded to survey questionnaire, 75% said they were concerned about the Springwell solar farm, the Fosse Green solar farm and the energy storage developments at Navenby. 75% said they were concerned about the loss of agricultural land and food security. 72% were concerned about the loss of	**Need** Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the*

Summary Position of Interested Party Welbourn Parish Council [RR-440]	Applicant Response
countryside heritage. 72% we're concerned about the visual impact of the substation pylons or panels in open countryside. 75% said they were concerned about large lithium battery storage units. 70% said they were concerned about pylons connecting the solar industrial development to the proposed substation at Navenby. 90% were concerned about the impact of digging underground cables up the cliff edge. To reflect these concerns the Welbourn Parish Council resolved at its meeting on 8 January 2025 to oppose to the proposed development of the Springwell Solar Farm.	*mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*" Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3. **Agricultural land and food security** The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of BMV land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The Applicant has sought to reduce impacts on BMV land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. This has influenced both the initial site selection process and the subsequent design evolution of the Proposed Development. This includes retaining fields for arable production that comprise solely of Grade 1 or 2 land. It would not be possible to advance with this project without the use of

Summary Position of Interested Party Welbourn Parish Council [RR-440]	Applicant Response
	some BMV land, and the Applicant has provided further justification for this, as referenced in Section 11.9 of **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** and within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.** In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. **Landscape and Visual Impact** At its closest, the boundary of Welbourn Parish lies approximately 2.5km west of the nearest above ground component of the Proposed Development. Welbourn village itself lies below the Lincoln Cliff, over 4km to the west of the Order Limits. No part of the Springwell Solar Farm would be visible from any residential property, road or Public Right of Way within Welbourn Parish. As such, there would be no landscape or visual impact within Welbourn Parish. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] reports that there would be a significant effect on landscape character and visual amenity further east and closer to the Proposed Development and these effects are summarised in **Table 10.13 of ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050]**.** An assessment of the inter-project cumulative effects with other existing development and/or approved developments, which includes the Fosse Green Solar Farm, Navenby Heath BESS and National Grid Navenby Substation is presented in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2]** and concludes that no significant inter-project cumulative effects are anticipated.

Summary Position of Interested Party Welbourn Parish Council [RR-440]	Applicant Response
	The grid connection between the Springwell Substation and the proposed National Grid Navenby Substation would be laid underground and not require any new pylons. No additional landscape or visual effects would arise in this regard. For the purposes of clarification, the Proposed Development would not require any underground cables to be laid up the Lincoln Cliff. This topographical feature lies over 3km to the west of the Order Limits. **Cultural Heritage** Cultural heritage was scoped into the assessment and the results are presented in **ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1]** [AS-012]. The potential significant effects on cultural heritage (including below ground archaeology and built heritage) informed the design of the Proposed Development. The ES has considered heritage assets within the Application Site and a surrounding 1 km study area (for non-designated heritage assets) and 5 km study area (for designated heritage assets) and concludes that there would be a significant effect on the scheduled monument of Brauncewell Medieval Village (paragraphs 9.9.21-25 **of ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1]** [AS-012]) as a result of less than substantial harm through change in its setting (as noted in the appendix to the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]) but that there would be no significant effects to any other heritage assets. There would be non-significant effects (as a result of less than substantial harm resulting from changes within their setting) to 23 listed buildings (as noted in Appendix 5 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]. **BESS Safety** The Applicant has applied industry best practice to the design of the BESS (Battery Energy Storage System), including the use of the NFCC (National Fire Chief Council) Guidance “Grid Scale Battery Energy Storage System planning – Guidance for FRS” and NFPA (National Fire Protection Association) 855 “Standard for the Installation of Stationary Energy Storage Systems” and these measures are agreed with Lincolnshire Fire and Rescue Service in the **Draft Statement of Common Ground - Lincolnshire Fire and Rescue Service [EN010149/APP/7.24]** [APP-0157]. The Applicant is engaging with the UK Health Security Agency on the subject of thermal runaway and details can be found in the **Statement of Common Ground – UK Health Security Agency [EN010149/APP/8.6].**

Summary Position of Interested Party Welbourn Parish Council [RR-440]	Applicant Response
	The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the **Outline Battery Safety Management Plan (oBSMP) [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** These documents set out the very low likelihood of such an event (1 in 7700 years), an aggregate figure which accounts for all example BESS enclosures within the compound) along with the worst case impacts that could occur. The **BESS Plume Assessment [EN010149/APP/7.19.2]** demonstrates that should a thermal runaway event occur, it would not pose significant risks to nearby human health receptors, including the closest residential receptors to the proposed BESS compound (approx. 440m to the southeast). In the very unlikely event that harmful impacts could occur, harmful impacts are predicted to only occur within tens of metres rather than hundreds of metres from the specific BESS enclosure involved in any thermal runaway event. The indicative design of the BESS enclosure and site layout follows guidance to lay assets out in a manner that limits the ability for a thermal runaway event to spread to adjacent enclosures or significantly impact the local community. Lincolnshire Fire and Rescue Service would respond to any BESS event according to a mutually agreed Emergency Response Plan secured in the **oBSMP [EN010149/APP/7.14.2]** which further reduces risk. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS Original Equipment Manufacturers advise that hose streams should not be directly discharged on BESS battery systems because this can significantly prolong a BESS failure event. A defensive tactic known as boundary cooling is used, which typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. This also ensures that water usage and environmental pollution risks are minimised. The **oBSMP [EN010149/APP/7.14.2]** and **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16.2]** [AS-016] set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation. This helps to avoid, control and mitigate the risk of contamination to nearby receptors.

4. Relevant Representations – Thematic Responses

4.1. Overview

4.1.1. Relevant Representations that have been submitted by IPs not included above have been arranged by topics raised within the Relevant Representations and then responded to in a thematic way below. This is not intended to underestimate the importance of the matters raised but responding to the representations in this way provides an accessible and informative response to the representations raised whilst avoiding excessive repetition.

4.1.2. This section summarises the thematic issues identified along with the Applicant's response. In some cases, it has been appropriate to respond to multiple issues with a single response.

4.1.3. Responses have been prepared for the following themes:

- BESS;
- Biodiversity;
- Community Impacts;
- Consultation;
- Cultural Heritage;
- Cumulative Impacts;
- Flood Risk;
- General;
- Health, Safety and Security;
- Land Contamination;
- Land Owner/Interest;
- Landscape and Visual;
- Land Use (including Agricultural Land and Minerals)
- Military and Aviation Interests
- Noise
- Principle of Development
- PRoW
- Socio-economics (including Community Benefits);
- Traffic and Transport.

Table 4-1: BESS

RR References	Summary of Issue Raised in RR	Applicant Response
RR-151; RR-210; RR-359; RR-165; RR-235; RR-220; RR-268; RR-100; RR-005; RR-034; RR-088; RR-248; RR-319; RR-017; RR-189; RR-104; RR-122; RR-215; RR-202	**BESS Impacts:** There is potential for impacts on the residents and on local wildlife.	An assessment of the effects of the Proposed Development on biodiversity including Local Wildlife Sites, habitats, protected and notable species within the vicinity of the proposed BESS is provided in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]**. The potential for impacts on a number of ecology receptors have been identified including Local Wildlife Sites, hedgerows, ground nesting birds and foraging bats. This has been used to inform the design and mitigation measures, following which, the assessment has determined that no significant adverse residual effects are anticipated. The BESS would be located on arable land. Nearby woodland would be excluded and protected by a minimum 15m buffer from any built development. There would also be a minimum 10m buffer from field margins and hedgerows, where these are to be retained. Buffer zones are secured in the **Design Commitments [EN10149/APP/7.4]** [APP-0138]. The embedded design and mitigation measures have been developed by ecologists and are considered to be suitable to mitigate the impacts on biodiversity. As outlined in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** the only semi-natural habitat which would need to be removed would be sections of hedgerow and calcareous grassland roadside margins to facilitate highways access to the BESS along Gorse Hill Lane (the calcareous grassland margin is a non-statutory designated Local Wildlife Site 'A15 Green Man Road to Cuckoo Lane'). The amount of hedgerow and calcareous grassland margin (LWS) proposed to be removed for access to the BESS would total approximately 136m and 334m respectively and would be re-instated or replaced as soon as possible after construction, as secured in the **oLEMP [EN10149/APP/7.9.2]**. The **oBSMP [EN010149/APP/7.14.2]** and **Flood Risk Assessment: Appendix - Outline Drainage Strategy [EN010149/APP/7.16]** [AS-016] set out methods to collect, contain and manage any firefighting water runoff during a thermal runaway event. It also sets out drainage strategy for normal operation, including rainwater runoff. This helps to avoid, control and mitigate the risk of contamination to nearby receptors.

RR References	Summary of Issue Raised in RR	Applicant Response
RR-414; RR-312; RR-249; RR-134; RR-096; RR-070; RR-060; RR-431; RR-236; RR-232; RR-214; RR-345; RR-152; RR-098; RR-045; RR-036; RR-447; RR-187; RR-121; RR-099; RR-292; RR-327; RR-242; RR-135; RR-035; RR-188; RR-178; RR-162; RR-208; RR-194; RR-420; RR-323; RR-260; RR-332; RR-259; RR-252; RR-085; RR-100; RR-061; RR-318; RR-285; RR-263; RR-013; RR-069; RR-168; RR-132; RR-183; RR-257; RR-277; RR-408; RR-433; RR-176; RR-196; RR-228; RR-343; RR-018; RR-167; RR-137; RR-045	**Fire Safety:** Concerned about the risk of fire from the BESS.	The Applicant has applied industry best practice to the design of the BESS (Battery Energy Storage System), including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems" and these measures are agreed with Lincolnshire Fire and Rescue Service in the **Draft Statement of Common Ground - Lincolnshire Fire and Rescue Service [EN010149/APP/7.24]** [APP-0157]. The Applicant is engaging with the UK Health Security Agency on the subject of thermal runaway and details can be found in the **Statement of Common Ground – UK Health Security Agency [EN010149/APP/8.6].** The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the **oBSMP [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** These documents set out the very low likelihood of such an event (1 in 7700 years), an aggregate figure which accounts for all example BESS enclosures within the compound) along with the worst case impacts that could occur. The **BESS Plume Assessment [EN010149/APP/7.19.2]** demonstrates that should a thermal runaway event occur, it would not pose significant risks to nearby human health receptors, including the closest residential receptors to the proposed BESS compound (approx. 440m to the southeast). In the very unlikely event that harmful impacts could occur, harmful impacts are predicted to only occur within tens of metres rather than hundreds of metres from the specific BESS enclosure involved in any thermal runaway event. Due to the typical weather conditions at the Order Limits, the smoke plume would likely be less than 6m in width. Higher wind speeds typically disperse external flaming from a BESS enclosure, shortening flame length and diluting the resultant smoke plume ensuring fire emission impairment distances are reduced. It should also be noted that the modelled plume remained well formed and showed a gradual rise and dilution as it moved downwind, reducing the risk to people at ground level. The indicative design of the BESS enclosure and site layout follows guidance to lay assets out in a manner that limits the ability for a thermal runaway event to spread to adjacent enclosures or significantly impact the local community. Lincolnshire Fire and Rescue Service would respond to any BESS event according to a mutually agreed Emergency Response Plan secured in the **oBSMP [EN010149/APP/7.14.2]** which further reduces risk. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS Original Equipment Manufacturers advise that hose streams should not be directly discharged on BESS battery systems because this can significantly

RR References	Summary of Issue Raised in RR	Applicant Response
		prolong a BESS failure event. A defensive tactic known as boundary cooling is used, which typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. This also ensures that water usage and environmental pollution risks are minimised. Part of the mitigations discussed and agreed with Lincolnshire FRS relate to the potential need for water to cool adjacent enclosures in the event of a fire. If required, the BESS compound can accommodate water storage over and above the minimum currently required under NFCC guidance; the drainage system is designed to fully capture external firefighting water, where the stored water would be tested before release or, if necessary, removed by tanker and treated offsite. If the captured firefighting water is deemed suitable, it can be reused by firefighters if additional water supplies are required for continued boundary cooling. As per the NFCC Guidance, at least two entrances are being provided into separate areas of the BESS compound. Appropriate measures would be agreed with the Lincolnshire FRS during detailed design to ensure that fire, smoke and any release of toxic gases do not significantly impact site operatives, first responders and the local community.
RR-160	**Methodology:** Concerns that there is no RAMS/Method Statement in place.	The Applicant has constructed multiple BESS facilities and each time a Risk Assessment and Method Statement (RAMS) has been in place prior to any related works starting on site. Safety of people (workers and public) and assets is a critical consideration in all aspects of the works from early design right through to decommissioning. Suitable RAMS will be produced at the right time within the project lifecycle to take account of the most up to date safety considerations, actual products being installed / maintained / decommissioned, available technology and best practice to name a few. For further details about construction, operational and decommissioning methodology, please see the **oCEMP [EN010149/APP/7.7.2]**, **oOEMP [EN010149/APP/7.10.2]** and **oDEMP [EN010149/APP/7.13.2].**
RR-285;RR-352;RR-132;RR-127; RR-134	**Noise:** Concern about noise impacts from the BESS.	An assessment of noise effects from the operational plant items, including the BESS, is provided in **ES Volume 1, Chapter 12: Noise and Vibration [EN010149/APP/6.1]** [APP-052]. Rated noise levels from all proposed plant items operating at 100% capacity during both daytime and night-time periods comply with the adopted noise criteria, as agreed with North Kesteven District Council and secured in Requirement 15 of the **Draft DCO [EN010149/APP/3.1.2]**.

RR References	Summary of Issue Raised in RR	Applicant Response
		The assessment concludes that the effects from noise during the operational phase is not significant following adoption of the mitigation measures secured in the **Works Plans [EN010149/APP/2.3]** [APP-007] and **oOEMP [EN010149/APP/7.10.2].** Requirement 13 of the **Draft DCO [EN010149/APP/3.1.2]** secures that prior to operation, an Operational Environmental Management Plan must be submitted to and approved by the relevant planning authority.
RR-396; RR-312; RR-232; RR-214; RR-175; RR-153; RR-187; RR-121; RR-323; RR-332; RR-100; RR-280; RR-157; RR-254; RR-285; RR-243; RR-446; RR-179; RR-215	**Proximity to properties:** The location of the BESS in close proximity to residents poses a risk to the community from fire and contamination.	The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the **Outline Battery Safety Management Plan (oBSMP) [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** These documents set out the very low likelihood of such an event (1 in 7700 years), an aggregate figure which accounts for all example BESS enclosures within the compound) along with the worst case impacts that could occur. The **BESS Plume Assessment [EN010149/APP/7.19.2]** demonstrates that should a thermal runaway event occur, it would not pose significant risks to nearby human health receptors, including the closest residential receptors to the proposed BESS compound which are: approx. 440m to the southeast; over 500m to West and South West; North East (likely plume direction) well over 1km away. These are measurements to the nearest boundary of the BESS compound as secured by the **Works Plans [EN010149/APP/2.3]** [APP-007].
RR-403; RR-397	**Scale of BESS:** concerns over the size of the proposal and amount of land take.	Paragraph 2.10.10 within NPS EN-3 sets out that government is supportive of solar development that is *"co-located with other functions (including storage) to maximise the efficiency of land use"*. The starting point for the size of the BESS is to make the best use of the National Grid connection agreement. There is an urgent need to decarbonise the grid, and the BESS plays an important role balancing the grid as set out in the **Statement of Need [EN010149/APP/7.1]** [APP-0135]. In any event, the size of the BESS is limited due to environmental considerations e.g. from environmental impact assessments like noise, and it is Associated Development to the principal development. The BESS facility has been sized to reflect the scale of the solar installation, as well as reflect the requirements for safe operation of the site, such as those in the NFCC Guidance.

Table 4-2: Biodiversity

RR References	Summary of Issue Raised in RR	Applicant Response
RR-414; RR-134; RR-096; RR-434; RR-431; RR-385; RR-231; RR-003; RR-345; RR-253; RR-098; RR-076; RR-119; RR-447; RR-412; RR-245; RR-187; RR-074; RR-309; RR-143; RR-313; RR-240; RR-199; RR-115; RR-421; RR-161; RR-292; RR-287; RR-235; RR-184; RR-150; RR-016; RR-327; RR-242; RR-146; RR-091; RR-365; RR-162; RR-021; RR-303; RR-268; RR-194; RR-384; RR-038; RR-323; RR-260; RR-406; RR-332; RR-259; RR-252; RR-085; RR-437; RR-419; RR-405; RR-394; RR-356; RR-301; RR-147; RR-118; RR-112; RR-064; RR-054; RR-033; RR-004; RR-418; RR-402; RR-398; RR-328; RR-318; RR-222; RR-071; RR-052; RR-287; RR-103; RR-423; RR-173; RR-403; RR-424; RR-013; RR-019;	**Biodiversity Impacts:** The Proposed Development will lead to large scale, irreversible harm for wildlife and does not provide adequate measures to mitigate the impact on wildlife habitats or species (loss and disruption).	An assessment of the effects of the Proposed Development on biodiversity including Local Wildlife Sites, habitats, protected and notable species is provided in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]**. It outlines the survey work that has been undertaken to inform the assessment. The potential for impacts on a number of ecology receptors have been identified including Local Wildlife Sites, hedgerows, ground nesting birds, foraging bats and scarce arable weeds. This has been used to inform the design and mitigation measures, following which, the assessment has determined that no significant adverse residual effects are anticipated. The embedded design and mitigation measures have been developed by ecologists and are considered to be suitable to mitigate the impacts on biodiversity. Proposals for habitat creation, habitat enhancement and management throughout the operational phase are anticipated to provide beneficial residual effects. The solar PV development area would be mostly on arable land. Important habitats, such as ponds, species-rich grassland and woodlands, have either been excluded from the Order Limits or would be retained and protected by offset buffers, including a minimum 15m buffer from woodlands, 10m buffer from field margins and hedgerows and 6m buffer from watercourses. The design of fencing has been considered to allow dispersal of wildlife across the Order Limits, including for deer, badgers, brown hare and hedgehogs. There would be no permanent lighting. Any lighting, such as required for safety purposes, would be sensitively designed to mitigate impact to nocturnal species such as bats. The implementation of buffer zones, design of fencing and lighting is secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138]. Extensive habitat creation and enhancement is proposed, which includes: • Creation of approximately 100 hectares (ha) of grassland consisting of calcareous and neutral grassland - managed as hay meadow to enhance biodiversity and extend existing road side wildlife sites, as well as planting of *c.* 15,563m of new hedgerow and 16ha of new tree belts. • Habitat creation and enhancement proposals outlined in **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095] provides indicative figures substantially above the minimum 10% commitment, demonstrating that the Applicant is expecting to deliver in excess of the minimum. The BNG Assessment provides for the following indicative figures subject to design change: 31.66% BNG in

RR References	Summary of Issue Raised in RR	Applicant Response
RR-170; RR-338; RR-351; RR-182; RR-028; RR-116; RR-132; RR-136; RR-149; RR-262; RR-277; RR-196; RR-205; RR-212; RR-228; RR-293; RR-335; RR-398; RR-018; RR-104; RR-211; RR-215; RR-315; RR-202; RR-137		respect of habitat units, 20.68% in respect of hedgerow units and 13% for water course units. The habitat condition criteria that must be reached to deliver the gain in biodiversity is set out within the BNG Assessment and this will form the basis of post construction monitoring ensuring that the predicted uplift is delivered. .
RR-003; RR-242; RR-435; RR-366; RR-285	**Biodiversity mitigation:** Concerns about the effectiveness of biodiversity mitigation.	The **oLEMP [EN10149/APP/7.9.2]** outlines how the mitigation identified will be implemented and subsequently maintained and monitored to ensure its effectiveness. Monitoring will include a feedback loop to ensure that if mitigation is not delivering the desired aims, then remedial management will occur. As well as habitats, the abundance and activity of species such as breeding birds and bats would also be monitored and compared with the baseline to determine the effectiveness of habitat enhancement measures and inform management.
RR-099	**Biodiversity Net Gain:** Explain how the Applicant will deliver net gain in biodiversity. The Proposed Development will impact on a range of species and habitats.	Requirement 8 of the **Draft DCO [EN010149/APP/3.1.2]** secures a minimum of 10% Biodiversity Net Gain (BNG). **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095] provides indicative figures substantially above the minimum 10% commitment, demonstrating that the Applicant is expecting to deliver in excess of the minimum. The BNG Assessment provides for the following indicative figures subject to design change: 31.66% BNG in respect of habitat units, 20.68% in respect of hedgerow units and 13% for watercourse units. Additional information provided within the **Draft Statement of Common Ground – Natural England [EN010149/APP/8.4]** and the **Draft Statement of Common Ground – Lincolnshire County Council [EN010149/APP/8.1]** outline how a net gain in watercourse units can be achieved. Biodiversity Net Gain requires that any habitat creation or habitat enhancement must meet the stated ecological condition as detailed **ES Volume 3 Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095]. For each habitat type within the operational solar farm a desired future ecological condition that must be achieved has been detailed. As part of the monitoring regime outlined in the **oLEMP [EN10149/APP/7.9.2]**, these condition criteria will be used to monitor the establishment of habitats and provide a clear audit trail as to whether

RR References	Summary of Issue Raised in RR	Applicant Response
		each of the condition criteria have been met or otherwise. If required habitat condition is not being met it will be clear which criteria have failed and what remedial action is required. As well as habitat monitoring, the abundance and activity of species such as breeding birds and bats would also be monitored and compared with the baseline to determine the effectiveness of habitat enhancement measures and inform further management.
RR-330 RR-261	**Bloxholm Wood:** Concerns about impacts on Bloxholm Wood.	The **Green Infrastructure Parameters Plan** within the **oLEMP [EN10149/APP/7.9.2]** shows that the solar PV development has been removed from the immediate vicinity of Bloxholm Wood and that the fields immediately adjacent to the woods will be managed as flower rich grassland to buffer the woodland and create additional wildlife habitat adjacent. In addition, it is also proposed to reinforce the woodland and hedgerows with additional strategic tree belt planting, while new permissive paths will provide walking loops and connect to other PRoWs to provide benefits for walkers with an enhanced network. Collectively it is considered these measures would mitigate potential adverse effects on Bloxholm Wood.
RR-014; RR-422; RR-238; RR-107; RR-381; RR-336; RR-136; RR-417	**Habitat management:** queries regarding the habitat management regime and the scale of active maintenance.	Very little semi-natural habitat will be removed as outlined in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]**. The only semi-natural habitat which would need to be removed would be sections of hedgerow and calcareous grassland field or roadside margins, which would be required to facilitate cable installation and highways access. The amount of hedgerow and calcareous grassland strips proposed to be removed would total approximately 1km of hedgerow and 550m of calcareous grassland verge and would be re-instated or replaced as soon as possible after construction. Approximately 15km of new hedgerow planting, 16ha of new tree belts and over 100ha of calcareous and neutral flower-rich grassland creation is proposed. Other semi-natural habitat such as woodland and ponds would be retained. Arable and improved grassland fields would be modified by the placement of Solar PV Modules within them but as outlined in the **oLEMP [EN10149/APP/7.9.2]** the land underneath and around the Solar PV Modules will be managed throughout the duration of the operational phase to boost biodiversity as well as approximately 100ha of new flower-rich grassland habitats. The **oLEMP [EN10149/APP/7.9.2]** outlines the management and mitigation identified, which will be implemented and subsequently maintained and monitored to ensure its effectiveness throughout the duration of the operational phase. Monitoring will include a feedback loop to ensure that if mitigation is not delivering the desired aims, then remedial management will occur.

RR References	Summary of Issue Raised in RR	Applicant Response
RR-398 RR-284 RR-365 RR-322 RR-228	**Hedgerow removal:** Concerns that protected hedgerows are being lost.	**ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** details in **Table 7.3** that up to 1,249m of hedgerow would be removed to facilitate cable installation, internal roads and highways access. Hedgerow removed would be replaced as soon as possible after construction. In total 15,563m of new hedgerow will be planted resulting in a 20% net gain of hedgerow units. The hedgerow sections that are to be removed have been subject to detailed hedgerow survey in **ES Volume 3, Appendix 7.11: Important Hedgerow Survey [EN010149/APP/6.3]** [APP-092]. Of the 48 sections of hedgerow proposed to be affected by works, nine of these hedgerows were deemed ecologically important under the Hedgerow Regulations 1997 and this information has been used to inform new hedgerow planting proposals outlined in the **oLEMP [EN10149/APP/7.9.2]**. The locations of important hedgerows and areas proposed for vegetation removal are shown in **ES Volume 2, Figure 7.4: Important Hedgerows and Areas Proposed for Vegetation Removal [EN010149/APP/6.2]** [APP-064].
RR-014 RR-398	**Invasive species:** concerns that the proposed planting measures will introduce non-native species.	No invasive plant species have been recorded on site. The **oLEMP [EN10149/APP/7.9.2]** recognises the potential for invasive non-native species to be brought in with planting stock and plant. Section 5.3.2 outlines that all planting material will be inspected and appropriate biosecurity measures implemented.
RR-090; RR-019; RR-117; RR-417; RR-439; RR-398; RR-399	**Protected and notable species:** Potential impact of the project on species such as barn owls, hares, hedgehog, red kite and deer.	**ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** outlines the survey work that has been undertaken to inform the assessment. Details on surveys are provided in **ES Volume 3, Appendices 7.1-7.13 [EN10149/APP/6.3]** [APP-082] – [APP-094]. The ecology receptors which were scoped in for detailed assessment, as they were considered most likely to be affected, are: Local Wildlife Sites, hedgerows, notable arable plants, ground nesting and wintering birds, barn owl and bats, as detailed in **Table 7.3**. Impacts to other habitats and species, such as invertebrates, marsh harrier, reptiles, water vole, badgers, brown hares, hedgehogs and deer, have also been considered in the assessment but were scoped out from further detailed assessment as it was reasoned at an earlier stage that they are unlikely to be significantly affected, as detailed in **Table 7.4**. **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** details the embedded design and additional mitigation measures, which are considered sufficient to mitigate impact and no significant residual impacts on biodiversity are anticipated. The **oLEMP [EN10149/APP/7.9.2]** details how the mitigation identified will be implemented and subsequently maintained and monitored to ensure its effectiveness. This includes the creation of

RR References	Summary of Issue Raised in RR	Applicant Response
		over 100ha of new flower-rich grassland, 16ha of new tree belts and 15km of new hedgerow planting. Fences would have clearances above ground to permit the passage of smaller wildlife such as brown hares, hedgehogs and mice into areas where there are Solar PV Modules, as well as installation of 'two-way mammal gates' for larger mammals such as badgers. Other standoff distances include a 6m buffer from watercourses, 15m from woodlands and 30m from known badger setts. The specification of buffer zones and fencing is embedded in the design, which is documented and secured in the **Design Commitments [EN010149/APP/7.4]** [APP-0138]. Preconstruction surveys would be undertaken to confirm the extent and distribution of badger activity, and this information will be used to inform the location of fencing and mammal gates. The fencing will be monitored during operation to ensure no wildlife gets caught up in the fencing.

Table 4-3: Community Impacts

RR References	Summary of Issue Raised in RR	Applicant Response
RR-414; RR-134; RR-070; RR-060; RR-055; RR-395; RR-386; RR-355; RR-352; RR-310; RR-231; RR-214; RR-175; RR-362; RR-309; RR-106; RR-090; RR-381; RR-016; RR-007; RR-135; RR-035; RR-365; RR-303; RR-145; RR-406; RR-085; RR-005; RR-112; RR-097; RR-302; RR-103; RR-285; RR-282; RR-069;	**Community Impacts:** The Proposed Development will create adverse impacts on the community. Concerns raised about whether local infrastructure will be able to cope with development.	The Applicant has submitted an **Environmental Statement [EN010149/APP/6.1-6.4]** as part of its Application which presents the findings of the Environmental Impact Assessment undertaken for the Proposed Development. The EIA process has assessed the likely significant effects on the environment resulting from the construction, operation (including maintenance) and decommissioning of the Proposed Development. This assessment includes the study of potential impacts on the local community. The ES identifies measures to avoid, prevent, reduce or, if possible, offset any likely significant adverse effects on the environment. These measures are designed to address concerns such as visual impact, noise, traffic, and ecological effects. The ES also identifies all residual effects, which can be defined as the likely impacts remaining following the implementation of mitigation measures. **ES Volume 1, Chapters 6 – 15 [EN010149/APP/6.1]** outlines the assessments and the proposed mitigation and monitoring measures proposed for each respective environmental factor. These

RR References	Summary of Issue Raised in RR	Applicant Response
RR-117; RR-136; RR-197; RR-237; RR-277; RR-425; RR-206; RR-122; RR-311; RR-089		chapters provide an overview of how the Applicant plans to minimise the impact on the sensitive receptors, including the community. The impact on roads used for construction access are detailed in **Table 14.23** of **ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010]**.** The traffic impact varies across the access network. on the A15 varies between 2% and 4% depending upon which section is under consideration. This is well below the threshold for undertaking a detailed assessment (10%). The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures outlined in the **oCTMP [EN010149/APP/7.8.2]**. Measures detailed in the oCTMP include setting approved access routes for HGV traffic, road signage strategy, a Staff Travel Plan, Community Liaison Group / Traffic Management Working Group, monitoring of the traffic management measures and effective enforcement measures. Reference to environmental impacts on health and wellbeing is provided in Table 5.2 of **ES Volume 1, Chapter 5: Approach to the EIA [EN010149/APP/6.1]** [APP-045], and from paragraph 8.1.38 to 8.1.47 in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]. The Applicant has assessed impacts to local occupancy rates, tourism and employment as a result of the Proposed Development in **ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2].** The assessment concludes that the maximum potential number of staff requiring overnight accommodation as a result of the Proposed Development is 6% of the peak number of construction workers required onsite. This equates to an expected maximum number of 39 staff that are 'not local' to the area and would therefore need to rely on local infrastructure. The assessment concludes that there would be no significant effects on occupancy and thus construction staff would not burden local infrastructure. The Applicant intends to provide benefits for the community through the enhancement of 2km of existing PRoWs and provision of approximately 3.49km of additional PRoW and 8.58km of permissive paths, provision of a community growing area of up to approximately 2ha to the north of Scopwick, a community fund of £400 per megawatt of installed capacity per year from the start of operation and lasting throughout the lifetime of the Proposed Development, and creating direct and indirect effects associated with employment, skills and education.

RR References	Summary of Issue Raised in RR	Applicant Response
		The Applicant intends to promote economic benefits for the community through the activities set out in the **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153]. The plan describes activities that would promote access to employment, upskilling and reskilling opportunities for local people. These could include work experience placements, access to jobs, and joint Apprenticeships across industry partners.

Table 4-4: Consultation

RR References	Summary of Issue Raised in RR	Applicant Response
RR-060; RR-214; RR-003; RR-376; RR-030; RR-039; RR-428; RR-004; RR-322; RR-230; RR-441	**Adequacy of Consultation**: comments raised about the adequacy of consultation with the community.	The Applicant approached pre-application consultation with a commitment to ensuring that anyone with an interest in the Proposed Development could find out more and share their views. This included two phases of formal consultation and a targeted consultation, alongside a programme of continuous stakeholder engagement. The Applicant is very grateful to all those who responded to the consultation and engaged with the project team to help shape the Proposed Development. The Applicant has had regard to all comments received through pre-application consultation and ongoing meetings and feedback from consultees. This is demonstrated and reported in the **Consultation Report [EN010149/APP/5.1]** [APP-019]. The evolution of the design of the Proposed Development, including how feedback has helped to shape the proposals is summarised in the **Design Approach Document [EN010149/APP/7.3.2].** In deciding whether to accept the Application for Examination, the Secretary of State must only accept the Application if it considers the Applicant has complied with all pre-application consultation requirements, including the statutory requirement to have regard to the consultation responses received. The Secretary of State must also have regard to adequacy of consultation responses received from Local Authorities. Given the Application was accepted by the Secretary of State, it can be assumed the Applicant has satisfied all consultation requirements and consulted adequately. The Applicant would also note that all Interested Parties now have an opportunity to be involved in the Examination and to make written submissions to the Examining Authority about matters they are concerned about, and/or to appear at hearings.

Table 4-5: Cultural Heritage

RR References	Summary of Issue Raised in RR	Applicant Response
RR-016; RR-005; RR-170; RR-365; RR-136; RR-248; RR-117	**Designated heritage assets:** The character of heritage assets and our appreciation of them can be significantly harmed.	The significance of designed heritage assets has been a key consideration in the design of the Proposed Development. Areas have been excluded from the Order Limits to protect the contribution that setting makes to the significance of designated heritage assets including conservation areas, listed buildings and scheduled monuments. Additional hedgerow planting will also screen the Proposed Development in views from designated heritage assets further reducing the effects. The only significant adverse effect identified is to Brauncewell Medieval Village scheduled monument. The Applicant submitted a Heritage Harm Statement as **Appendix 5** of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] that sets out the level of harm to significance for designated heritage assets, including those that were scoped out of the Environmental Statement due to the effects being not significant. The potential extent of the harm is summarised below. The summary of the assessment is set out in Table 9.9, **ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1]** [AS-012]. This confirms that, due to the embedded mitigation measures designed into the layout of the Proposed Development, with the exception of Brauncewell Medieval Village scheduled monument there will be no significant effect to any above-ground designated or non-designated historic assets during any phase of the Proposed Development. **Annex 12** of **ES Volume 3, Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2]** [AS-014] provides detailed information of the predicted changes to the setting of designated heritage assets within the study area and the effects on their significance.
RR-136; RR-016; RR-303	**General heritage impacts:** The development could encroach on areas of cultural and historical significance, diminishing the heritage value of Scopwick and its surroundings.	The Proposed Development has been designed to minimise the effects on both above ground and below ground heritage assets including the conservation area at Scopwick and the listed buildings within it. The use of ballast foundations or similar over areas of archaeological sensitivity (where appropriate and as detailed within the **Outline Written Scheme of Investigation [EN010149/APP/7.15]** [APP-0148] and paragraph 3.4.13 of **ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2]**) will ensure that no significant effects to below ground heritage assets will occur as a result of solar PV development. Any areas of archaeological sensitivity which do not merit preservation in situ and cannot be avoided would be subject to

RR References	Summary of Issue Raised in RR	Applicant Response
		archaeological investigation and recording which will increase knowledge of the local heritage. Details of the archaeological mitigation are included in the **Outline Written Scheme of Investigation [EN010149/APP/7.15]** [APP-0148].

Table 4-6: Cumulative Impacts

RR References	Summary of Issue Raised in RR	Applicant Response
RR-058; RR-319	**Cumulative impacts on biodiversity:** Concerns about cumulative impacts on biodiversity.	The Applicant has further considered its assessment of the potential long-term cumulative impact of habitat change (during the operational phase) rather than just assessment during the (relatively short-term) construction phase. The detailed cumulative assessment has considered intra-project effects for example air quality and disturbance acting on biodiversity and this is outlined **in ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1.2].** In addition, **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2]** presents the results of the inter-project effects from the proposed Navenby National Grid Substation, and other similar scale development projects in proximity. The full list of projects considered is outlined in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2]** which will be updated regularly during the Examination to include any new developments that form part of the short list of inter-project cumulative developments assessed. The potential for cumulative impacts relates to the cumulative loss of agricultural land and impacts on ground nesting birds and foraging and commuting bats primarily, and clearly without adequate mitigation there could be cumulative impacts. The information in the public domain indicates that the developments considered in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2]** have identified ground nesting birds and bats as biodiversity receptors, and it is indicated that they will provide sufficient mitigation to offset any residual impacts. Therefore, provided each of the above proposed developments fully mitigated for any residual impacts no significant cumulative impacts have been identified.

RR References	Summary of Issue Raised in RR	Applicant Response
		The effects of habitat change/loss of open arable land on ground nesting birds has been a key consideration in the design of the Proposed Development and so habitat measures proposed include: • Over 100ha of grassland habitat is proposed to be created to provide enhanced quality nesting habitat for ground nesting birds (based on number of skylark territories identified on Site). • enhancement of field margins (wild bird seed plant mixes, arable flora enhancement, tussocky grassland), herbal ley and grassland treatments under Solar PV modules to increase foraging habitat. • 15,563m of new hedgerow and 16ha of new tree belts. Details of habitat creation, enhancement and management proposals are in the **oLEMP [EN10149/APP/7.9.2].**
RR-174; RR-105; RR-368; RR-042; RR-075; RR-125; RR-191	**Cumulative impacts on landscape character:** The development could encroach on areas of landscape character, diminishing the value of Scopwick and its surroundings.	As set out in the **Design Approach Document [EN010149/APP/7.3.2]**, Project Principle 1.2 sought to achieve appropriate offsets to local settlements and dwellings on a case by-case basis whilst Project Principle 2.3 sought to maintain the rural separation between the villages of Ashby de la Launde, RAF Digby, Scopwick, Kirkby Green and Blankney. Solar PV development in Springwell East lies beyond several fields to the north east of Scopwick whilst the eastern edge of Solar PV development in Springwell Central also lies beyond several more fields to the south of Scopwick. The ZTVs presented in **ES Volume 2, Chapter 10 Figure 10.6: Solar PV Detailed Screening ZTVs [EN010149/APP/6.2]** [APP-066] suggest that theoretical visibility of the Solar PV development extends up to Trundle Lane to the north of Scopwick and also demonstrates the absence of any visibility within the settlement itself. Site work has established that the belts of vegetation which surround this settlement, combined with multiple additional layers of intervening hedgerow, would screen any view of the Proposed Development from Scopwick. It has therefore been assessed that there would be no view of any element of the Proposed Development, during construction, operation and maintenance or during decommissioning from any location within this village. As a result, the heritage value of Scopwick conservation area will not be diminished.
RR-416; RR-312; RR-249; RR-395; RR-355; RR-214; RR-036; RR-313; RR-227; RR-121; RR-062; RR-016; RR-	**Cumulative impacts due to the no. of projects in Lincolnshire:** Concerns about the cumulative impacts	An assessment of the inter-project cumulative effects with other existing development and/or approved developments, which includes the Fosse Green Solar Farm, Navenby Heath BESS and National Grid Navenby Substation is presented in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].** This assessment considers the potential combined impacts of Springwell Solar Farm alongside other nearby projects and outlines that no significant residual inter-project

RR References	Summary of Issue Raised in RR	Applicant Response
390; RR-178; RR-420; RR-350; RR-169; RR-127; RR-005; RR-435; RR-334; RR-321; RR-271; RR-213; RR-366; RR-254; RR-322; RR-368; RR-058; RR-117; RR-348; RR-273	as a result of the number of projects in Lincolnshire.	cumulative effects are anticipated, assuming the other developments have adequate mitigation in place. A long list of existing development and/or approved developments is provided in **ES Volume 3, Appendix 16.1: Cumulative Long List [EN010149/APP/6.3.2]**. This long list has been kept under review by the Applicant to allow for a robust assessment of inter-project cumulative effects. The information provided in this appendix is accurate as of 30 August 2024. The Applicant remains committed to updating the cumulative long list as new developments come into the public domain, ensuring that the assessment remains as accurate and comprehensive as possible throughout the examination process. The Applicant has submitted a revised assessment of cumulative effects to consider Leoda Solar Farm. This is presented in Version 2 of **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2]** submitted at Deadline 1. The assessment of inter-project cumulative effects has been limited to publicly available information obtained from the relevant planning applications on the planning portals of North Kesteven District Council, Lincolnshire County Council and the Planning Inspectorate. For some of the short-listed other existing developments and/or approved developments, including the National Grid Navenby Station, relevant information to inform this assessment has not been available and the Applicant has had to make assumptions using professional judgement to inform a qualitative assessment.
RR-028; RR-125	**Cumulative impacts on health:** Concern about cumulative impacts on health and wellbeing.	An assessment of the inter-project cumulative effects with other existing development and/or approved developments, which includes the Fosse Green Solar Farm, Navenby Heath BESS and National Grid Navenby Substation is presented in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].** The assessment considers the individual environmental effects that may have the potential to influence health pathways, for example – air quality, noise, transport and access, and socio-economics – that may have the potential to result in significant cumulative effects. This assessment considers the potential combined impacts of Springwell Solar Farm alongside other nearby projects and outlines that no significant inter-project cumulative effects are anticipated. Therefore, when applying professional judgement to this scenario, it was concluded that no express assessment of the mental health and wellbeing impacts would be required, as the likely effects would not be significant.

RR References	Summary of Issue Raised in RR	Applicant Response
RR-255; RR-096; RR-005; RR-042; RR-058; RR-230; RR-351; RR-117; RR-436	**Cumulative loss of farmland in Lincolnshire:** Concerns about the cumulative loss of farmland in Lincolnshire.	The Applicant has sought to reduce impacts on BMV land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. This has influenced both the initial site selection process and the subsequent design evolution of the Proposed Development. This includes retaining fields for arable production that comprise solely of Grade 1 or 2 land. It would not be possible to advance with this project without the use of some BMV land, and the Applicant has provided further justification for this, as referenced in Section 11.9 of **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** and within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.** As set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] at paragraph 8.8.15 onwards, out of the 1280ha of land within the Order Limits, 231.7ha is BMV, which is proposed to be utilised for hard infrastructure, i.e. collector compounds, Springwell Substation, Solar PV development, and BESS. A further 77ha is proposed to be used for Green Infrastructure, with the remainder (232.5ha) required for the installation of cabling, which will be available for agricultural use once the cable has been installed. The area of BMV agricultural land, which will therefore be unable to be farmed while the development is in place (up to 40 years) therefore represents approximately 24% of the Order Limits. This increases to 42% if the area to be temporarily out of use while the cable is being laid is included. Whilst agricultural production will be lost at this site for the duration of the Proposed Development, it will have minimal impact upon total crop production nationally and in Lincolnshire. An assessment of the temporary loss of BMV agricultural land from solar developments in Lincolnshire and within 1km of the Nottinghamshire boundary has been undertaken, as detailed in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2]**. In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being

RR References	Summary of Issue Raised in RR	Applicant Response
		permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible.

Table 4-7: Flood Risk and Drainage

RR References	Summary of Issue Raised in RR	Applicant Response
RR-368; RR-414; RR-249; RR-172; RR-209; RR-062; RR-287; RR-150; RR-030; RR-178; RR-162; RR-268; RR-265; RR-293; RR-228; RR-176; RR-183; RR-316	**Siting of panels:** Concerns regarding the siting of panels within flood zones.	The EA's flood map for planning shows that the majority of the site is located within Flood Zone 1, which represents a 1 in 1000 year or less annual probability of flooding from fluvial sources as detailed in **Appendix B.2** of the **Flood Risk Assessment [EN010149/APP/7.16.2]** [AS-016]. The Solar PV modules have been designed to sit 1m above ground levels. Given that the deepest present day fluvial flood depth is approximately 600mm and the majority of surface water flooding across the entire site does not exceed 300mm, this will provide a freeboard of 400mm in areas of fluvial flooding and 700mm in areas of surface water flooding in the present day scenario. Taking a conservative approach to the consideration of climate change, a 900mm future fluvial flood depth has been proposed as a 'maximum credible scenario. Given the sensitive equipment will be located above this flood level, the development is considered to be resilient to future changes in flood risk over its lifetime. Though some areas of the Solar PV modules are within Flood Zone 2 and Flood Zone 3, the Solar PV models are not anticipated to disrupt the flooding pathways overland, therefore the extents of the Flood Zones will remain the same once the Solar PV modules are erected. Within the fluvial floodplain the only form of infrastructure proposed is solar PV panels. These panels have been designed to be elevated 1m above ground level and there will be negligible loss of floodplain as a result of the stands supporting the solar PV modules. There are no ground raising requirements in the areas of solar PV modules. Floodplain compensation is not required. All of the proposed vulnerable infrastructure such as the Springwell Substation and BESS units will be placed in the northwestern region of the Site where the flood risk from all sources is considered to be 'very low'. This area is a significant distance from the area of Flood Zone 3 and is considered to remain safe even in the extreme climate change scenario.

RR References	Summary of Issue Raised in RR	Applicant Response
RR-177; RR-183	**Runoff and increased risk of flooding:** Concerns regarding an increased risk of runoff from solar panels and increased risks of flooding.	Any precipitation falling on each solar panel will runoff the panels and flow towards / infiltrate in the rain shadow of the down-slope modules. This feature will enable the use of the rain shadow area of the panels to maintain the infiltration potential of the site. The **Outline Drainage Strategy** which forms an appendix to the **Flood Risk Assessment [EN010149/APP/7.16.2]** [AS-016] sets out how any run-off will be captured and managed from the site and ensure that pre development (QBAR greenfield) run off is maintained with no additional flows entering Scopwick Beck or any other watercourse. The retention of flows to QBAR greenfield rates will result in a reduced peak flow from current natural runoff from the site during extreme rainfall events, offering a reduction in offsite flows for all rainfall events in excess of the QBAR (approx. 1 in 2 year) event. Excess flows will be retained on site in suitably designed attenuation features. There will be no ground raising in the fluvial flood zones, with the only infrastructure in the area of Flood Zone 2 and 3 being the supports for the panels, as such there will be no loss of floodplain storage and no interruption of existing flow paths. Flood risk as a result of the Proposed Development will be negligible.
RR-265; RR-250; RR-419; RR-302; RR-398; RR-249; RR-096; RR-143; RR-313; RR-227; RR-209; RR-166; RR-062; RR-099; RR-135; RR-265; RR-419; RR-357; RR-088; RR-279; RR-343; RR-398; RR-104; RR-202	**Pollution from Panels and BESS:** Concerns raised over the potential for pollution of water features from damaged panels or BESS firewater.	The Proposed Development will be continually monitored for any damage to panels and other infrastructure with emergency measures in place to control any pollution spills as secured in the **oCEMP [EN010149/APP/7.7.2] and oOEMP [EN010149/APP/7.10.2]**. The proposed drainage of the BESS will be in line with the latest best practice and regulatory requirements to ensure that potentially contaminated spent firewater will be controlled, contained and disposed off appropriately. Potential pollution of watercourses during the construction phase has been carefully considered. Proposed mitigation measures secured by the **oCEMP [EN010149/APP/7.7.2]**, **oOEMP [EN010149/APP/7.10.2]**, and **oDEMP [EN010149/APP/7.13.2]** include: • completing site investigation work to assess if there is any existing contamination on-site that requires remediation; • measures to prevent disturbance of existing contamination; • emergency procedures to manage accidental spillages and leaks in order to minimise any risk to the soil and groundwater; • completing a piling risk assessment to ensure that potential impacts to groundwater are identified and minimised; and • measures to manage firewater associated with the BESS.

Table 4-8: General

RR References	Summary of Issue Raised in RR	Applicant Response
RR-174; RR-241; RR-003; RR-172; RR-016; RR-435; RR-306; RR-366; RR-105; RR-042; RR-075; RR-136; RR-183; RR-279	**National Planning Policy Framework (NPPF) December 2024:** concerns regarding the assessment of paragraphs 187, and 189 have not been taken into consideration as part of the application.	Paragraph 5 of the NPPF confirms that it does not contain specific policies for NSIPs but that the NPPF may be a relevant matter in decision making. Whilst not specifically addressing NSIPs, the NPPF does set out its objectives to achieve sustainable development by pursuing economic, social and environmental objectives in development. The NPPF has been assessed as set out below and within the Planning Policy—Table of Compliance, Table 4, which can be found in Appendix 3 of the **Planning Statement** [AS-018]**,** including paragraphs 187 and 189 of the NPPF December 2024 refer to Section 15: Conserving and Enhancing the natural environment. Paragraph 187 of the NPPF highlights the importance of conserving valued landscapes, biodiversity, and soils, recognising the beauty and benefits of the countryside and agricultural land, and protecting coastal areas. It also promotes biodiversity gains, ecological resilience, and support for threatened species. Additionally, it aims to reduce pollution and land instability, improve environmental conditions like air and water quality, and remediate degraded or contaminated land where needed. **ES Volume 1, Chapter 7: Biodiversity[EN10149/APP/6.1.2]** assesses impacts on protected species, habitats, and other species identified as being of principal importance for biodiversity conservation. Competent ecologists have carried out the assessment, advising during the design process to ensure that impacts are avoided, minimised, and mitigated in line with the mitigation hierarchy and that biodiversity enhancements are maximised. **ES Volume 1, Chapter 7: Biodiversity[EN10149/APP/6.1.2]** confirms that there are no ancient woodlands contained within the Order Limits. Six veteran trees have been identified near Scopwick only one of which is within the Order Limits. The tree in question is over 250m from any development and will not be directly affected and measures are outlined in the **oCEMP [EN010149/APP/7.7.2], oLEMP [EN10149/APP/7.9.2]** and **oDEMP [EN010149/APP/7.13.2]** to ensure protection of the tree (and other trees) during the lifetime of the Proposed Development. Sections 7.7 and 7.9 of **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** set out the expected likely significant effects and residual effects, respectively, on the above receptors during construction, operation and decommissioning of the Proposed Development. The assessment concludes that no potential significant adverse effects have been identified on any internationally, nationally, or locally designated sites during the Proposed Development's construction, operation, or

RR References	Summary of Issue Raised in RR	Applicant Response
		decommissioning. There are five statutory designated sites within 10km of the Order Limits boundary, including: Metheringham Heath Quarry SSSI, High Dyke SSSI, Tattershall Old Gravel Pits SSSI, Tattershall Carrs SSSI and Nitrate Vulnerable Zone. **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.2]** concludes that there are no potential significant adverse effects identified on any internationally, nationally, or locally designated sites during construction, operation or decommissioning of the Proposed Development. The Proposed Development will meet a minimum 10% BNG as secured by Requirement 8 of the **Draft DCO [EN010149/APP/3.1.2]** and the **oLEMP [EN10149/APP/7.9.2]**. **ES Volume 3, Appendix 7.14: BNG Assessment [EN010149/APP/6.3]** [APP-095] demonstrates that the Proposed Development is committed to achieving significant biodiversity net gain on site. **ES Volume 1, Chapter 11: Land, Soils and Groundwater EN010149/APP/6.1.2]** and the **oSMP [EN010149/APP/7.11.2]** set out how agricultural land was considered in the design of the Proposed Development, the Proposed Development's embedded mitigation measures, and principles on how the soils will be managed and protected during its construction, operation, and decommissioning. Paragraph 189 of the NPPF as summarised that significant importance should be placed on conserving and enhancing the landscape and scenic beauty of National Parks, the Broads, and National Landscapes, as they hold the highest level of protection. Wildlife and cultural heritage in these areas are also key priorities. Development within these protected areas should be limited, and any development nearby must be carefully designed and located to reduce negative impacts. **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] concludes that no part of the Site or its immediately surrounding context falls within a statutorily designated landscape. The nearest National Park or National Landscape (formerly known as an Area of Outstanding Natural Beauty) to the Site is the Lincolnshire Wolds National Landscape, located more than 20km to the northeast, and this would not be affected by the Proposed Development.
RR-292; RR-238; RR-242; RR-178; RR-100; RR-435; RR-355; RR-306; RR-366; RR-322; RR-042; RR-075; RR-	**Good Design:** concerns that the Applicants have not considered the criteria for good design set out in Section 4.7 of NPS EN-1.	The **Design Approach Document [EN010149/APP/7.3.2]** and Appendix 3 (Policy Compliance Assessment Tables) of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] demonstrate how the Proposed Development fulfils the requirement for good design and demonstrates adherence to the mitigation hierarchy (to avoid, reduce, mitigate, compensate) set out and required within NPS EN-1 and NPS EN-3.

RR References	Summary of Issue Raised in RR	Applicant Response
136; RR-319; RR-176; RR-202		In accordance with Section 4.7 of NPS EN-1, the **Design Approach Document [EN010149/APP/7.3.2]** explains how good design has been embedded into the Proposed Development from the outset of the design process via a clear design framework and the application of design principles. This has provided a shared understanding of desired outcomes for the Proposed Development and informed decision making. The document explains the way in which the design has evolved since inception, the rationale for the proposals contained within the DCO Application, and the mechanism by which good design would be secured post-consent. The approach to good design was discussed with NKDC and LCC at key meetings throughout the engagement process (as outlined in Table 1: Record of Engagement within the relevant SoCGs). This included an overview of the design approach and the use of design principles, presentation of the Project Principles and presentation of the securing mechanisms. Further evidence demonstrating how the Applicant has adhered to 'NSIP: Advice on Good Design' (which was issued in October 2024, shortly before the DCO submission) will be submitted at Deadline 1 as Appendix 2 of the **Design Approach Document [EN010149/APP/7.3.2]**.
RR-060; RR-214; RR-172; RR-040; RR-098; RR-284; RR-036; RR-150; RR-016; RR-327; RR-053; RR-035; RR-178; RR-194; RR-259; RR-252; RR-322; RR-352; RR-183; RR-279; RR-228; RR-343; RR-398; RR-018; RR-104; RR-122; RR-139; RR-315	**Decommissioning:** concerns regarding the decommissioning process and the recycling of panels.	The decommissioning process is detailed in **ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2]** which states that at the end of the operational (including maintenance) phase, any aboveground infrastructure will be dismantled and removed per industry best practices. Solar PV modules are made up of several materials, including a metal frame. Approximately 99% of the Solar PV modules can currently be recycled. When decommissioning, options to reuse or recycle materials available at the time will be explored to ensure that as much of the materials as possible are recycled and diverted from landfill. The Proposed Development is anticipated to generate some Waste Electrical and Electronic Equipment (WEEE) through operation and maintenance, and a substantive amount of WEEE at decommissioning which would include Solar PV modules, batteries, and substation equipment, as well as other smaller quantities of WEEE from supporting electrical infrastructure. As such, these would be recovered and recycled by an authorised re-processor as required by the WEEE Regulations 2013. To ensure that this is done to "Best Available Treatment Recovery and Recycling Techniques", a list of up-to-date authorised reprocessors would be established prior to the operational phase of the Proposed Development and kept up to-date throughout the operation and decommissioning phases of the Proposed Development. This is secured through the **oDEMP**

RR References	Summary of Issue Raised in RR	Applicant Response
		[EN010149/APP/7.13.2] which is secured by a requirement in the **Draft DCO [EN010149/APP/3.1.2].**
RR-414; RR-345; RR-107; RR-007; RR-327; RR-225; RR-424	**Impacts on residential property values:** concerns regarding potential impacts on residential house prices.	The Applicant has sought to limit impacts on properties close to the Proposed Development in accordance with the Project Principles set out in the **Design Approach Document [EN010149/APP/7.3.2].** This includes the provision of appropriate offsets to local settlements and dwellings on a case-by-case basis (Principle 1.2) and maintaining the rural separation between local villages (Principle 2.3). An appraisal of visual effects on residential properties close to the Proposed Development is presented in **ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3]** [APP-111]. In total, it has been assessed that the residents of 25 dwellings would experience significant visual effects during year 1. Still, in most cases, by year 10, these effects would reduce in magnitude due to the establishment of mitigation and by year 10, they would not be significant. No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. Following the Phase Two Consultation, the Applicant refined the development boundary, removing 68 Category 1 and 2 persons and all 154 Category 3 persons initially identified. After diligent inquiry, the Applicant does not consider there to be any remaining Category 3 persons. However, should any parties consider that their property has decreased in value as a direct result of the physical impacts from the operation of the Proposed Development, such as noise and vibration, they may be eligible to claim for compensation under Part 1 of the Land Compensation Act 1973.
RR-363; RR-249; RR-070; RR-431; RR-352; RR-126; RR-214; RR-040; RR-014; RR-313; RR-166; RR-043; RR-381; RR-208; RR-301; RR-075; RR-243; RR-	**Supply chain:** concerns regarding the sourcing of panels.	A full lifecycle GHG assessment has been conducted in **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1]** [APP-048], which takes into account a reasonable worst-case assessment of the embodied emissions from solar PV modules. This has used a wide range of data available from Environmental Product Declarations (EPDs) from solar PV modules from a range of source countries (including China as part of Asia) and includes the emissions of the manufacture and transport of these materials. All members of the supply chain will provide a carbon reduction plan where feasible, allowing for the optimisation of emissions associated with the supply chain. This

RR References	Summary of Issue Raised in RR	Applicant Response
088; RR-014; RR-292; RR-137; RR-107		measure will be secured in the **oCEMP [EN010149/APP/7.7.2]**. Inclusive of these embodied emissions the Proposed Development has been demonstrated to have a net carbon negative effect, contributing to net carbon savings globally, and resulting in net GHG savings of over 9.6 million tonnes of CO2e. Carbon assumptions underpinning this assessment are included within **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1]** [APP-048], and are either based directly on the guidance or from best knowledge provided by design and engineering teams. The Applicant would embed mitigation measures such as the implementation of a carbon reduction plan, the responsible sourcing of materials, and a review of Environmental Product Declarations (which were the sources of multiple assumptions regarding manufacturing emissions, as shown **in ES Volume 3, Appendix 8.1: Raw Data and Emissions Factors [EN010149/APP/6.3]** [APP-096]. The Applicant opposes the abuse of human rights and forced labour anywhere in the global supply chain. As part of the procurement process, the Applicant would take a rigorous approach to ensuring its suppliers comply with relevant legislation (such as the Modern Slavery Act 2015) and its requirements as set out in an ethical procurement policy as set out in the **Outline Skills, Supply Chain and Employment Plan [EN010149/APP/7.20]** [APP-0153].

Table 4-9: Health

RR References	Summary of Issue Raised in RR	Applicant Response
RR-385; RR-175; RR-076; RR-284; RR-011; RR-327; RR-101; RR-263; RR-075; RR-364; RR-028; RR-132; RR-136; RR-226; RR-319; RR-380; RR-408; RR-417; RR-027; RR-176; RR-205; RR-293; RR-	**Impacts on health and wellbeing:** concerns about impacts on general community health and wellbeing.	The Applicant recognises that several representations have been raised that relate to concern about the Proposed Development's effects on physical and mental health and wellbeing as a result of environmental change. At an early stage, the Project advised of its intention to consider effects on human health through individual topic chapters within the EIA. The Scoping Opinion received from PINS (see **ES Volume 3, Appendix 5.2: Scoping Opinion [EN010149/APP/6.3]** [APP-076]), as well as LCC and NKDC confirmed that this approach was acceptable on the basis that the ES should clearly set out potential impacts on human health from the Proposed Development during construction, operation and decommissioning and cross-

RR References	Summary of Issue Raised in RR	Applicant Response
398; RR-311; RR-221; RR-202; RR-137		references are made to where impacts are considered and assessed within other relevant topic chapters of **ES Volume 1.** In **ES Volume 3, Appendix 5.3: Scoping Opinion Response Matrix [EN010149/APP/6.3]** [APP-077] the Applicant set out that consideration of impacts upon human health as a result of the Proposed Development are covered through the findings of other assessments undertaken as part of the EIA, such as air quality, landscape and visual, noise and vibration and traffic and transport Reference to environmental impacts on health and wellbeing is provided in Table 5.2 of **ES Volume 1, Chapter 5: Approach to the EIA [EN010149/APP/6.1]** [APP-045], and from paragraph 8.1.38 to 8.1.47 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]. The Applicant also recognises that there is a substantial number of Relevant Representations from members of the public, Parish Councils and local opposition groups that cite concern about physical and mental health and wellbeing, related to a wider range of factors. The Applicant is content that receptors and health pathways, and individual environmental effects related to health and wellbeing have been appropriately considered, assessed and mitigated for (where practicable) as per the approach agreed at EIA Scoping. However, given the number of representations (noting that mental health can be affected by the clear provision and articulation of information), the position of key stakeholders and the fact that the approach to consideration of health and wellbeing is split across a number of different ES chapters, Management Plans and other documents (such as the **Equality Impact Assessment [EN010149/APP/7.18]** [APP-0151]), the Applicant considers that it would be beneficial to provide a comprehensive document that consolidates these elements in one place to demonstrate the consideration of health pathways through the submission a **Health and Wellbeing Summary Statement [EN010149/APP/8.10]** at Deadline 1.
RR-385; RR-236; RR-107; RR-150; RR-327; RR-135; RR-265; RR-085; RR-302; RR-046; RR-075; RR-136; RR-286	**Public safety:** concerns regarding public safety, security and risks to the community.	The Applicant has developed the design of the Proposed Development to consider public safety and security throughout the construction, operation and decommissioning phases. Each area of the Proposed Development has been assessed against its function and requirements for security measures, focused on being safe and secure by design. This has informed the siting of the Proposed Development and led to incorporation of safety measures such as fencing, security gates, CCTV and PIR lighting.

RR References	Summary of Issue Raised in RR	Applicant Response
		Details of proposed safety and security provisions are provided in the **oOEMP [EN010149/APP/7.10.2], ES Volume 2, Figure 3.12: Typical Security Details [EN010149/APP/6.1]** [APP-060], **oCEMP [EN010149/APP/7.7.2]** and **oDEMP [EN010149/APP/7.13.2]**. A summary of how the design of the Proposed Development has considered the safety of specific users groups and risks is provided as follows: • PRoW users: The **Design Approach Document [EN010149/APP/7.3.2]** demonstrates how the Proposed Development has been designed to create a safe and accessible environment for PRoW users within the Order Limits. This includes minimum offsets to Solar PV development (to create a wide walking corridors), new routes to provide a better-connected network and new surfacing, signage and /or waymarking. These are secured by the **Works Plans [EN010149/APP/2.3]** [APP-007] and **Design Commitments [EN010149/APP/7.4]** [APP-0138]. The **oPROWPPMP [EN010149/APP/7.12.2]** provides further details on how the PRoWs and Permissive Paths within the Order Limits, particularly where they cross construction traffic access tracks, will be managed by the Applicant to ensure they are safe and accessible throughout construction, operation (including maintenance) and decommissioning of the Proposed Development. • Road users: The Applicant has assessed the likely significant effects arising from the construction, operation (including maintenance) and decommissioning of the Proposed Development on traffic and transport within **ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010]. The assessment concludes that there are no significant effects on the local road network or its users, including for road safety. Mitigation measures to ensure the safety of all road users are outlined in the **oCTMP [EN010149/APP/7.8.2]**. This includes measures including setting approved access routes for HGV traffic, road signage strategy, a Staff Travel Plan, Community Liaison Group / Traffic Management Working Group, monitoring of the traffic management measures and effective enforcement measures. • Aviation users: **ES Volume 3, Appendix 5.4: Glint and Glare Study [EN010149/APP/6.3.2]** assesses glint and glare for aviation users, including the critical stages of flight at licenced aerodromes within 10km of the Order Limits and outlines that any instances of yellow glare are considered to be operationally accommodatable. Paragraph 2.10.159 of NPS EN-3 advises that *"while there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety".*

RR References	Summary of Issue Raised in RR	Applicant Response
		• Fire safety: the Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable design and mitigation measures in accordance with Industry Guidance as detailed within the **oBSMP [EN010149/APP/7.14.2]** and **BESS Plume Assessment [EN010149/APP/7.19.2].** The conformance of the Proposed Development to the National Fire Chief Council Guidance and Lincolnshire Fire and Rescue Service input has included several design impacts such as compound location, number of entrances and amount of firefighting water storage, as set out in the oBSMP. • EMF safety: An assessment for electromagnetic fields for underground cabling, transformer and substations has been undertaken and is presented **in ES Volume 3, Appendix 5.5: High-Level Electromagnetic Field Assessment [EN010149/APP/6.3]** [APP-079]. The assessment recommends a minimum clearance distance of 25m relative to public exposure limits for magnetic and electric fields related to the 400kV cable route, which is secured in the **Works Plans [EN010149/APP/2.3]** [APP-007] and concludes that there would be no electromagnetic effects to sensitive receptors.
RR-249; RR-096; RR-143; RR-313; RR-209; RR-166; RR-062; RR-099; RR-265; RR-419; RR-357; RR-088; RR-279; RR-343; RR-398; RR-104; RR-202	**Use of chemicals:** concerns regarding the use of chemicals within the panels/BESS and potential impacts of those.	During the operational life of each solar panel, maintenance operations will ensure that no chemicals or heavy metals will be released from within the panels. Any damaged panels would be removed and replaced in accordance with the **oOEMP [EN010149/APP/7.10.2]**. Panels that are correctly maintained will not result in any release of chemicals or heavy metals to the environment. There are no expected leaks of chemicals from the BESS as part of normal operation. With faulty, damaged or end-of-life assets, a key method to reducing the risk of chemical impacts is to ensure they are removed and disposed of responsibly. Should there be any unexpected contamination, this would be mitigated and managed in accordance with the **oCEMP [EN010149/APP/7.7.2], oOEMP [EN010149/APP/7.10.2]** and **oDEMP [EN010149/APP/7.13.2].**

Table 4-10: Land Contamination

RR References	Summary of Issue Raised in RR	Applicant Response
RR-414; RR-249; RR-003; RR-292; RR-287; RR-150; RR-365; RR-188; RR-030; RR-178; RR-265; RR-194; RR-252; RR-435; RR-306; RR-004; RR-366; RR-302; RR-413; RR-424; RR-042; RR-075; RR-136; RR-183; RR-279; RR-319; RR-378; RR-389; RR-109; RR-214; RR-119; RR-398	**Impacts on soil:** concerns about impacts on the soil from leakage of parts.	The potential impacts on soils has been assessed within **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]**. The land beneath and around the solar panels will not be adversely affected by any release of contaminants from the panels themselves. The panels are sealed units, and any internal components are protected from the weather by the external frame and cover. The Solar PV modules would not materially increase the impermeable area and, therefore, are not anticipated to increase the volume of surface water runoff. Any runoff from the Solar PV modules will be a result of rainwater only. A rainwater gap will separate the individual Solar PV modules, allowing rainwater to drain freely to the ground between the panels and helping to replicate the greenfield runoff conditions. Therefore, the rainwater would be safely released to the underlying soil without any adverse impacts on soil or groundwater. During the operational life of each solar panel, maintenance operations will ensure that there is no damage to panels which would result in the release of any contaminants from within the panels under the action of rainwater, wind or other factors. Any damaged panels would be removed and replaced in accordance with the **oOEMP [EN010149/APP/7.10.2]**. Panels that are correctly maintained will not result in any release of chemicals or heavy metals to the environment.
RR-060; RR-098; RR-178; RR-136; RR-279; RR-408; RR-343	**Impacts on groundwater and the aquifer:** concerns regarding potential impacts on groundwater from the development, the potential for impacted groundwater to leach into surrounding surface water, and impacts on surrounding land, as well as on the underlying Lincolnshire Limestone aquifer.	The potential for land and groundwater to be adversely impacted by the Proposed Development has been considered in detail by the assessment in **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]**. This considered the current baseline sensitivity of the groundwater, and then identified works during construction, operation or decommissioning that could cause pollution to occur. Mitigation measures to prevent pollution are included in the management plans as detailed below. For the site, the groundwater receptors are assigned high sensitivity in some areas (where there is a principal aquifer and a groundwater source protection zone), and in other locations the groundwater sensitivity is medium or low. Where the Lincolnshire Limestone and the Blisworth Limestone geological formations are present, the aquifers within these units are classified as medium sensitivity where they are outside the areas of groundwater source protection zones, and high sensitivity where there is a groundwater source protection zone present (in an area west of Scopwick). Due to the robust mitigation measures that are included in management plans for all three phases of Proposed Development, the potential impact on groundwater when mitigation

RR References	Summary of Issue Raised in RR	Applicant Response
		measures are in place is assigned a significance of low adverse. This means that the residual effect on the groundwater receptors (of all sensitivity levels) is not expected to be significant due to the measures that will be in place to protect the receptor. The movement of contamination within groundwater to ultimately reach surface water receptors is also controlled by these proposed mitigation measures, as the measures to prevent contamination entering the soil or groundwater will also ensure that no contamination reaches nearby surface water features. Proposed mitigation measures, that will be secured by the **oCEMP [EN010149/APP/7.7.2], oOEMP [EN010149/APP/7.10.2]**, and **oDEMP [EN010149/APP/7.13.2]** include: • completing site investigation work to assess if there is any existing contamination on-site that requires remediation; • measures to prevent disturbance of existing contamination; • emergency procedures to manage accidental spillages and leaks in order to minimise any risk to the soil and groundwater; • completing a piling risk assessment to ensure that potential impacts to groundwater are identified and minimised; and • measures to manage firewater associated with the BESS. As well as protecting the soil and groundwater close to the Site, these measures will ensure that contamination does not migrate away from the Site, so there will be no contamination that will be able to travel within the soil or groundwater and affect neighbouring properties. Firewater will be collected on-site, and not released to the environment, as secured by the **OEMP [EN010149/APP/7.10.2]**, and **oDEMP [EN010149/APP/7.13.2]** Therefore any contaminants present within this water would not be released to the environment and would not be able to leach into the groundwater. Runoff from construction areas will be managed during works by the **oCEMP [EN010149/APP/7.7.2]** and will not be released directly to the soil/groundwater. This will ensure that there is no accidental release of contaminants from working areas into the wider environment. Any runoff from solar panels will be a result of rainwater only, so this can be safely released to the underlying soil without any adverse impacts on soil or groundwater. During the operational life of each solar panel, maintenance operations will ensure that there is no damage to panels which would result in the release of any contaminants under the action of rainwater, wind or other factors. Any damaged panels would be removed and replaced in accordance with the **oOEMP**

RR References	Summary of Issue Raised in RR	Applicant Response
		[EN010149/APP/7.10.2]. Panels that are correctly maintained will not result in any release of chemicals or heavy metals to the environment.

Table 4-11: Land Use

RR References	Summary of Issue Raised in RR	Applicant Response
RR-174; RR-241; RR-391; RR-396; RR-414; RR-363; RR-337; RR-330; RR-249; RR-070; RR-055; RR-006; RR-434; RR-431; RR-386; RR-352; RR-297; RR-232; RR-214; RR-175; RR-155; RR-153; RR-151; RR-065; RR-037; RR-003; RR-345; RR-253; RR-067; RR-040; RR-098; RR-076; RR-401; RR-210; RR-095; RR-377; RR-186; RR-171; RR-045; RR-036; RR-024; RR-447; RR-445; RR-187; RR-074; RR-442; RR-359; RR-309; RR-238; RR-129; RR-128; RR-107; RR-313; RR-240; RR-227; RR-209; RR-199; RR-165; RR-121; RR-115; RR-090; RR-062; RR-	**Loss of high quality agricultural land:** concerns about loss of high quality agricultural land and the use of farmland for solar panels.	The applicable policy tests are those set out in section 5.11 of NPS EN-1, namely whether the use of agricultural land is justified and necessary and whether the loss of BMV land has been minimised through site selection. Paragraphs 8.8.3-8.8.35 and 8.8.44-8.8.50 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and paragraphs 3.3.17-3.3.27 of the appended **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] demonstrate that these tests have clearly been met for Springwell Solar Farm. Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant. The Applicant has sought to reduce impacts on BMV land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. This has influenced both the initial site selection process and the subsequent design evolution of the Proposed Development. This includes retaining fields for arable production that comprise solely of Grade 1 or 2 land. It would not be possible to advance with this project without the use of some BMV land, and the Applicant has provided further justification for this, as referenced in Section 11.9 of **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** and within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**.**

RR References	Summary of Issue Raised in RR	Applicant Response
421; RR-161; RR-099; RR-083; RR-381; RR-292; RR-235; RR-220; RR-184; RR-150; RR-144; RR-016; RR-374; RR-327; RR-267; RR-242; RR-195; RR-146; RR-135; RR-053; RR-017; RR-365; RR-188; RR-390; RR-178; RR-303; RR-162; RR-268; RR-329; RR-268; RR-194; RR-094; RR-444; RR-384; RR-372; RR-350; RR-323; RR-145; RR-142; RR-039; RR-331; RR-324; RR-260; RR-234; RR-127; RR-072; RR-406; RR-332; RR-259; RR-252; RR-419; RR-100; RR-005; RR-448; RR-437; RR-435; RR-409; RR-407; RR-405; RR-394; RR-357; RR-356; RR-355; RR-346; RR-342; RR-340; RR-334; RR-306; RR-301; RR-298; RR-280; RR-271; RR-224; RR-218; RR-213; RR-157; RR-147; RR-133; RR-118; RR-112; RR-102; RR-101; RR-086; RR-066; RR-054; RR-		In the context of the Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a), with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant. The area of BMV agricultural land within Lincolnshire is estimated to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure. In any event the proposed use is long-term temporary and reversible. The Proposed Development will result in the temporary use of some higher grade (BMV) agricultural land for solar development, cabling, access tracks and green infrastructure, together with some permanent use for green infrastructure only. The amount of BMV agricultural land used has been minimised through the site selection and design development process as outlined in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** [APP-044]; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely. As set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] at paragraph 8.8.15 onwards, out of the 1280ha of land within the Order Limits, 231.7ha is BMV, which is proposed to be utilised for hard infrastructure, i.e. collector compounds, Springwell Substation, Solar PV development, and BESS. A further 77ha is proposed to be used for Green Infrastructure, with the remainder (232.5ha) required for the installation of cabling, which will be available for agricultural use once the cable has been installed. The area of BMV agricultural land, which will therefore be unable to be farmed while the development is in place (up to 40 years) therefore represents approximately 24% of the Order Limits. This increases to 42% if the area to be temporarily out of use while the cable is being laid is included.

RR References	Summary of Issue Raised in RR	Applicant Response
033; RR-032; RR-398; RR-366; RR-318; RR-302; RR-275; RR-269; RR-254; RR-222; RR-216; RR-071; RR-052; RR-392; RR-308; RR-287; RR-140; RR-138; RR-111; RR-067; RR-432; RR-360; RR-322; RR-285; RR-282; RR-034; RR-082; RR-093; RR-105; RR-415; RR-427; RR-049; RR-307; RR-314; RR-403; RR-424; RR-448; RR-015; RR-368; RR-002; RR-009; RR-019; RR-042; RR-069; RR-158; RR-170; RR-204; RR-243; RR-244; RR-274; RR-276; RR-283; RR-352; RR-388; RR-181; RR-182; RR-281; RR-364; RR-400; RR-028; RR-056; RR-081; RR-088; RR-132; RR-156; RR-177; RR-180; RR-183; RR-201; RR-248; RR-256; RR-257; RR-272; RR-277; RR-279; RR-299; RR-300; RR-319; RR-326; RR-341; RR-347; RR-380; RR-408; RR-411; RR-433; RR-		

RR References	Summary of Issue Raised in RR	Applicant Response
436; RR-438; RR-446; RR-027; RR-045; RR-051; RR-087; RR-110; RR-176; RR-189; RR-196; RR-198; RR-205; RR-206; RR-293; RR-335; RR-343; RR-349; RR-361; RR-373; RR-398; RR-443; RR-018; RR-104; RR-122; RR-148; RR-311; RR-379; RR-141; RR-191; RR-207; RR-211; RR-215; RR-229; RR-221; RR-202; RR-167; RR-219; RR-109; RR-137; RR-309		
RR-313; RR-227; RR-121; RR-062; RR-178; RR-350; RR-435; RR-366; RR-322; RR-042; RR-351	**Food security:** concern about the impact of agricultural land loss will reduce food production levels.	Following amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means that there is no longer a need to consider the cumulative impact of the loss of land available for food production as a consequence of multiple NSIPs. Notwithstanding the removal of consideration of food production from the NPPF, even if this were a relevant policy consideration, the Applicant maintains that the impacts of the Proposed Development on food production will not be significant.

Table 4-11: Land Interest/Ownership

RR References	Summary of Issue Raised in RR	Applicant Response
RR-058	**Engagement:** comments about the level of engagement with affected landowners.	The Applicant has been engaging with all affected landowners as set out in the **Schedule of Negotiations and Powers Sought [EN010149/APP/4.4]** [APP-018] and undertook extensive consultation prior to submission of the DCO application. Where applicable the Applicant has issued Heads of Terms and engaged with landowners with a view to reach a voluntary agreement before the end of the examination period.
RR-058; RR-192	**Impacts on Land Ownership and Rights:** comments questioning the Proposed Development's possible infringement on the rights of local landowners and farmers, disrupting existing land use and livelihoods.	The Applicant has considered the areas of the Proposed Development that may infringe on the rights of local landowners and farmers and the subsequent effects that could have. **ES Volume 1: Chapter 13 - Population [EN010149/APP/6.1]** [APP-053] sets out an assessment of effects on agricultural land holdings, with the significance of effects influenced by the loss or change in quality or integrity of resources, acquisition of land and buildings and changes in accessibility / severance. It also considers the change in agricultural employment capacity in the context of the wider sub-regional agricultural economy. During the construction phase, it is expected that two agricultural operations will lose access to a portion of the land normally available. As the construction phase progresses this land loss is expected to increase. As a result, it is likely that the output of the farming operation will reduce year on year across the approximate four year construction period. It is acknowledged that the Proposed Development during its construction and operational phases will reduce the farmed area of the operations, although the operators anticipate that the reduction in staff would be met entirely through retirement and a pause on recruitment. The overall change in employment capacity is considered to be minimal in the scale of the wider agricultural economy, and compensation agreements would be sought with the operators. The land within the Order Limits that will be temporarily used during the construction phase to install the cabling will continue to be used for farming operations during the operational (including maintenance) phase. The Applicant believes the impact on this area of land to be minimal and only during construction given that it is an easement for a cable.

	The Applicant where applicable will assess compensation on a case-by-case basis in accordance with the Compensation Code.

Table 4-11: Landscape and Visual Impacts

RR References	Summary of Issue Raised in RR	Applicant Response
RR-174; RR-134; RR-003; RR-209; RR-105; RR-075; RR-167	**Adequacy of screening:** comments questioning whether the proposed screening will be sufficient to mitigate the impacts of the proposal.	The Applicant has developed the design of the Proposed Development to provide a sensitive response to the local environment and reduce potential impacts in accordance with the Project Principles set out in the **Design Approach Document [EN010149/APP/7.3.2]**. Potential landscape and visual effects and mitigation measures have been considered from the outset of the Proposed Development but it has always been recognised that it would not be feasible or indeed desirable to completely screen the Proposed Development from all receptor locations. The Applicant acknowledges that the Proposed Development would be visible to varying degrees from certain locations within and surrounding the Order Limits both in the medium term following construction and in the long term for the operational duration of the Proposed Development. Some significant visual effects have been identified and these are summarised in **Table 10.13** of **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050]**.** New green infrastructure in the form of hedgerows and structural planting as well as earthworks in the vicinity of Springwell Substation have been embedded as mitigation within the Proposed Development as illustrated in **ES Volume 2, Figure 3.3: Green Infrastructure Parameter Plans [EN010149/APP/6.2]** [APP-060]. From many receptor locations these measures would either fully or partially screen views of the Proposed Development once planting has established and for many receptors the identified visual effects would reduce in magnitude and significance as a result of this mitigation. Table 10.8 of **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] sets out the specific intended function of the mitigation planting proposed. The Applicant therefore considers that adverse visual effects have been mitigated as far as practicable and the design response is proportionate and appropriate to the landscape context of the Proposed Development.

RR References	Summary of Issue Raised in RR	Applicant Response
RR-187; RR-242; RR-025; RR-322; RR-424; RR-088; RR-180; RR-375; RR-167	**Glint and glare:** concerns regarding glint and glare impacts from panels.	Paragraph 2.10.159 NPS EN-3 sets out that there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore *"unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms*". **ES Volume 3, Appendix 5.4: Glint and Glare Study [EN010149/APP/6.3.2]** concludes there are not significant glint and glare impacts and so there is no potential for significant impairment on aircraft safety from glint and glare. In addition, the implication from the context which supports the study is that the potential for users of the aforementioned receptors to actually experience yellow glare is limited and, should the yellow glare be experienced, it would be for fleeting moments. On this basis the Applicant considers it is compliant with the requirements of paragraph 2.10.159 on EN-3. The Applicant is further committing to anti-reflective/anti-glare coating in accordance with paragraph 20.10.134 through further screening measures along the A15, and will consider further potential mitigation measures such as tilt of panel, in accordance with paragraphs 2.10.135 – 2.10.136, at detailed design stage.
RR-174; RR-241; RR-416; RR-312; RR-249; RR-134; RR-070; RR-006; RR-434; RR-386; RR-355; RR-352; RR-232; RR-214; RR-153; RR-065; RR-003; RR-345; RR-067; RR-152; RR-045; RR-143; RR-007; RR-376; RR-406; RR-147; RR-322; RR-105; RR-173; RR-403; RR-424; RR-448; RR-042; RR-075; RR-243; RR-283; RR-351; RR-352; RR-117; RR-132; RR-136; RR-183; RR-300; RR-358; RR-380;	**Landscape impacts:** concerns about landscape impacts and changes to the rural character of the area.	**ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] acknowledges that there would be a significant adverse effect on landscape character for the duration of the construction, operation and decommissioning phases of the Proposed Development across parts of Landscape Character Area 7 (LCA 7): Limestone Heath. Specifically, significant effects would be limited to the following tract of landscape in LCA 7: • from Heath Lane in the north to just south of Dunston Pit Plantation and extending west of the A15 as far as Wellingore Heath, Temple Bruer and Brauncewell; • to the east of the A15, extending up to Heath Road as far as RAF Digby; • on the eastern side of Heath Road extending up to a series of plantations to the east (Bloxham Woods, Ashby Thorns, Rowston Covert); and • across the tract of land between RAF Digby, Scopwick, the B1188 and Rowston Covert). **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] acknowledges that there would also be a significant adverse effect on landscape character for the duration of the construction, and during the early years of operation (up to year 10) of the Proposed Development across parts of Landscape Character Area 11 (LCA 11): Central Gravels and Clays. Specifically, significant effects during the early years of operation would be limited to the following tract of landscape in LCA 11:

RR References	Summary of Issue Raised in RR	Applicant Response
RR-426; RR-017; RR-443; RR-311; RR-073; RR-202		• between the railway which defines the eastern boundary of Springwell East; • B1188 to the west; • Blankney Walks Lane to the north; and • Trundle Lane and PRoW Scop/739/1 to the south By year 10 of the operational phase, it is considered that effects on LCA 11 would be not significant. Several representations have referred to the Proposed Development as an 'industrialisation' of the landscape. The Applicant considers that the term 'industrial' is inappropriate in the context of the Proposed Development. This term is not used in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050], however this chapter does acknowledges that the character and appearance of the landscape within the Order Limits would change from arable farmland to a utility-scale solar PV development. The effect on landscape character would arise principally from a change in land cover; ostensibly the introduction of new Solar PV development, Satellite Collector Compounds, BESS, Springwell Substation and ancillary infrastructure such as fencing and CCTV into fields which are currently in agricultural land use. The Solar PV development would, however, be underlain by legume-rich modified grassland maintaining a vegetative ground cover throughout the majority of the Site. The extent of manufactured metallic and glass structures introduced into the landscape would be greater than exists in the landscape at present but this tract of the landscape is not wild or natural without human influence. It is an intensively farmed, working landscape with some strong built influences such as the A15, overhead powerlines, RAF Digby and occasional utilitarian agricultural buildings. The landform, pattern and underlying landscape fabric of the Order Limits would remain largely undisturbed. The Applicant notes that NPS EN-1 paragraph 5.10.5 recognises that all proposed energy infrastructure is likely to have visual effects for many receptors around the proposed development. It also considers that the scale of energy projects means they will often be visible across a wide area and the Secretary of State (SoS) should balance whether the proposed impact would be offset by the benefit of the proposed development. Critically the SoS should consider how well designed a project is and whether an Applicant has genuinely sought to minimise harm to the landscape including by way of use of appropriate mitigation. EN-3 expands on this point and advises applicants to minimise landscape and visual impacts through screening.

RR References	Summary of Issue Raised in RR	Applicant Response
		Section 5.3 of the **Design Approach Document [APP-0137]** explains how the design of the project has responded over time to increased understanding of the Site and its context as well as in response to consultation feedback including how the relevant Project Principles have helped frame that design. This approach includes the general approach but also the specific design approach to individual properties, PRoW and other landscape related factors and responds directly to the requirements of EN-1 paragraph 5.10.6 which sets out that projects "*need to be designed carefully, taking account of the potential impact on the landscape… the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate*". As set out above, the number and significance of potential impacts has been greatly reduced by way of the application of the mitigation hierarchy in the Applicant's design, seeking to avoid, then reduce and lastly adopting the provision of appropriate mitigation measures. This is a matter for the planning balance as set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and is reflected in paragraph 5.10.35 of EN-1 which states that the "*scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it would not be offset by the benefits (including need) of the project*". It is important that this is considered in the context of the Critical National Priority (CNP) designation of the Proposed Development and the provision within NPS EN-1 paragraph 4.2.15 which advises that should residual effects remain after the mitigation hierarchy has been applied, which it has been rigorously done, then any such impacts are "*unlikely to outweigh the urgent need for this type of infrastructure*". Consideration of the Project Principles throughout the iterative design process has informed the spatial extent of the Order Limits which includes offsets to local settlements, dwellings, roads and PRoW. This has resulted in three distinct parcels of Solar PV development (in Springwell West, Central and East) which are responsive to the distinctive and unique character of the site. Solar PV development within these parcels would be further subdivided and compartmentalised by the existing framework of trees and woodlands, existing and proposed landforms and proposed tree belts and hedgerows. This would be secured by the **oLEMP [EN10149/APP/7.9.2].** As a result, the mass, scale and form of the Solar PV Development and Springwell Substation would not be viewed as a continuous block of development and the 'modular' characteristics of the Proposed Development allow it to sit within the existing landscape fabric. These factors would assist to reduce the overall perceived scale of the development.

RR References	Summary of Issue Raised in RR	Applicant Response
		Whilst the Applicant acknowledges that the total land area which would be occupied by the Proposed Development is large, it is considered that the design response adopted has minimised adverse effects on landscape character as far as practicable. Significant effects on landscape character would be restricted to a relatively narrow radius around the Order Limits and appropriate mitigation measures have been proposed to either screen or soften visual effects where appropriate.
RR-414; RR-345; RR-107; RR-007; RR-327; RR-225; RR-424	**Impact on Residential Properties:** the impacts of the development on the amenities of the occupiers of nearby residential properties.	The Applicant has sought to minimise likely significant effects, in particular visual effects and impacts to residential amenity in relation to properties in closest proximity to or within the Proposed Development in accordance with the Project Principles set out in the **Design Approach Document [EN010149/APP/7.3.2]**. This includes the provision of appropriate offsets to local settlements and dwellings on a case by-case basis (Principle 1.2) and maintaining the rural separation between the villages of Ashby de la Launde, RAF Digby, Scopwick, Kirkby Green and Blankney (Principle 2.3). The approach to limiting visual effects is reported in Section 5 (Design Evolution) and Section 6 (Proposed Development) of the **Design Approach Document [EN010149/APP/7.3.2]** and includes details of how this will be secured by the **Works Plans [EN010149/APP/2.3]** [APP-007] and **Design Commitments [EN010149/APP/7.4]** [APP-0138]. **ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3]** [APP-111] assesses potential effects on residential properties, which are summarised in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050]. In total, it has been assessed that the residents of 25 dwellings would experience significant visual effects during year 1 but in most cases by year 10 these effects would reduce in magnitude due to the establishment of mitigation and by year 10 would be not significant. No residential property would experience a visual effect which was so overbearing that it would render the dwelling an unpleasant or unattractive place to live.

Table 4-12: Military and aviation interests

RR References	Summary of Issue Raised in RR	Applicant Response
RR-337; RR-242 RR-096, RR-254, RR-322,	**Civil Aviation Authority:** concerns regarding impacts to the registered microlight site.	Glint and glare impacts upon aviation activity associated with the registered microlight site, Hill Top Farm Airfield, have been assessed within **ES Volume 3, Appendix 5.4: Glint and Glare Study [EN010149/APP/6.3.2]** considering specific receptors defined by the airfield owner, including final approaches and two circuits. The assessment concludes that instances of glare with intensities greater than the acceptable intensities (in accordance with the guidance for licensed aerodromes (Pager Power Glint and Glare Guidance), Sandia National Laboratories methodology, industry best practice, and the NPS EN-3 paragraph 2.10.159 which states 'whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety) It is therefore considered the glare scenario could be operationally accommodated for, due to these instances occurring in the early hours of the morning and views of reflecting panels coinciding with the sun; a far greater source of light. The Applicant is continuing to engage with Hill Top Farm to understand the impact in context of their operations.
RR-192; RR-372	**Exclusion Zone:** comments requesting an increase to the exclusion zone around the registered microlight site.	The Applicant recognises that individuals who live close to an infrastructure project will have concerns about the impact that it may have on them and undertook extensive pre-application engagement with individuals in the local area. **ES Volume 3, Appendix 5.4: Glint and Glare Study [EN010149/APP/6.3.2]** assesses potential impacts on this receptor. As part of the design development for the Proposed Development, the Applicant reduced the extent of the Order Limits in proximity to the affected properties. This is detailed in the Design Approach Document **[EN010149/APP/7.3.2]** and was consulted on at statutory consultation. Further mitigation in addition to reducing the extent of the Order Limits is secured by the **Design Commitments [EN010149/APP/7.4]** [APP-0138] which includes planting to screen PV panels and the use of buffers.
RR-242; RR-322; RR-117; RR-375	**Glint and glare:** concerns regarding glint and glare impacts from panels for military and aviation interests.	Glint and glare impacts upon aviation activity associated with licensed, military, and unlicensed (i.e. General Aviation) aerodromes have been assessed within **ES Volume 3, Appendix 5.4: Glint and Glare Study [EN010149/APP/6.3.2]**. The assessment concludes that no significant impacts are predicted upon licensed and military aviation activity; with the Ministry of Defence confirming this position within the **Draft Statement of Common Ground - Ministry of Defence [EN010149/APP/8.7].** Impacts upon unlicensed aerodromes are not deemed significant, and instances of glare intensities greater than the acceptable intensities (in accordance with the

RR References	Summary of Issue Raised in RR	Applicant Response
		guidance for licensed aerodromes and industry best practice) could be operationally accommodated.
RR-363; RR-249; RR-098; RR-117	**Military interests:** concerns about the proximity of the scheme to nearby RAF bases.	The Applicant is in ongoing discussions with the MOD regarding RAF Digby and other military interests within the 'Safeguarding Zones' as set out in the **Draft Statement of Common Ground - Ministry of Defence [EN010149/APP/8.7].** Safety and security of the military interests, in relation to the presence of the Proposed Development, have not been raised as a concern in these discussions. As part of the discussions, the MOD requested certain changes to the Proposed Development, which have been accommodated. Ongoing discussions will ensure the Proposed Development does not adversely affect the safe and efficient operation of RAF Digby or other nearby military interests.

Table 4-13: Noise

RR References	Summary of Issue Raised in RR	Applicant Response
RR-431; RR-003; RR-235; RR-150; RR-005; RR-004; RR-311	**Construction noise impacts:** concerns regarding construction noise impacts on wildlife and nearby communities.	An assessment of noise effects from the construction phase is provided in **ES Volume 1, Chapter 12: Noise and Vibration [EN010149/APP/6.1]** [APP-052]. The assessment of noise impacts accounts for both the impact of construction traffic by adopting the worse-case construction years (i.e those with the predicted highest traffic movements) along the immediate road network and also construction tasks within the field areas. The construction assessment accounts for all the plant items associated for each task occurring simultaneously across the construction area(s), positioned at the nearest distance to each receptor. The assessment concludes that the effects from noise during the construction phase are not expected to be significant on residential receptors. Requirement 12 of the **Draft DCO [EN010149/APP/3.1.2]** secures that prior to construction, a Construction Environmental Management Plan must be submitted to and approved by the relevant planning authority. Section 3 of the **oCEMP [EN010149/APP/7.7.2]** provides a list of mitigation measures, pertinent to noise in order to minimise impacts, through Best Practicable Means (BPM) as defined by the Control of Pollution Act 1974.

RR References	Summary of Issue Raised in RR	Applicant Response
		Section 2 of the **oCEMP [EN010149/APP/7.7.2]** sets out the proposed approach to community liaison which would ensure occupiers of neighbouring properties are informed in advance of the construction works. The community liaison officer would provide the community with an appropriate person who would be appointed to lead discussions and act as the primary point of contact should there be any queries or complaints.
RR-003; RR-327; RR-034; RR-352; RR-183; RR-104	**Operational noise impacts:** concerns regarding operational noise impacts from equipment including the substation.	An assessment of noise effects from the operational phase, including the substation is provided in **ES Volume 1, Chapter 12: Noise and Vibration [EN010149/APP/6.1]** [APP-052]. Rated noise levels from all proposed plant items operating at 100% capacity during both daytime and night-time periods comply with the adopted noise criteria, as agreed with North Kesteven District Council and secured in Requirement 15 **of the Draft DCO [EN010149/APP/3.1.2]**. The assessment concludes that the effects from noise during the operational phase are not expected to be significant following adoption of the mitigation measures as outlined in the **Design Commitments [EN10149/APP/7.4]** [APP-0138]. Additionally, for the operation of the Proposed Development, Requirement 13 of the **Draft DCO [EN010149/APP/3.1.2]** secures that prior to operation, an Operational Environmental Management Plan must be submitted to and approved by the relevant planning authority.

Table 4-14: Principle of Development

RR References	Summary of Issue Raised in RR	Applicant Response
RR-174; RR-241; RR-249; RR-386; RR-126; RR-003; RR-253; RR-098; RR-377; RR-309; RR-238; RR-121; RR-043; RR-100; RR-004; RR-392; RR-308; RR-105; RR-415; RR-314; RR-448; RR-015; RR-	**Alternatives:** comments raise the need to consider alternatives such as rooftop and brownfield solar.	Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, "*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy.*

RR References	Summary of Issue Raised in RR	Applicant Response
042; RR-204; RR-388; RR-181; RR-277; RR-179; RR-215; RR-229; RR-137; RR-309; RR-234		*Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.*" Sections 7.2 and 7.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explain that there are insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost, to meet the government's Net Zero and energy security targets. Large-scale ground mounted schemes such as the Proposed Development must come forward, and smaller-scale solar must be considered in addition to large-scale solar, as per Para 2.10.10 of NPS EN-3. Paragraph 4.3.9 of the EN-1 states that: *"…the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to a proposed development is in the first instance matter of law."* It goes on to state that *"This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites".* Paragraph 4.3.23 advises that the SoS should be guided by whether there is a *"reasonable prospect of the alternative delivering the same infrastructure capacity… in the same timescale as the proposed development"*. Paragraph 4.3.24 importantly recognises that the SoS should not *"refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure"*. The paragraph continues to say that the SoS should have regard to the possibility that *"all suitable sites for energy infrastructure of the proposed type may be needed by future proposals"*. **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** [APP-044] sets out the Applicant's approach to Alternatives. The **Site Selection Report** at **Appendix 1** of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] demonstrates that the relevant policy was considered and its applicability to the Applicant's site selection process. Where specific policy or legislation requires the consideration of alternatives, these are addressed at paragraphs 8.1.26 – 37 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018].

RR References	Summary of Issue Raised in RR	Applicant Response
RR-174; RR-241; RR-261; RR-294; RR-165; RR-043; RR-146; RR-390; RR-178; RR-419; RR-435; RR-302; RR-042; RR-088; RR-018; RR-137; RR-221	**Alternative technology:** comments on panels being inefficient and alternative technologies should be considered.	**ES Volume 1, Chapter 4: Reasonable Alternatives Considered[EN010149/APP/6.1]** [APP-044] sets out the Applicant's approach to alternatives, including locations and technologies. The Chapter concludes that no reasonable alternatives could utilise the grid connection offer made available to the Proposed Development to deliver to the urgent need for significant amounts of new large-scale energy infrastructure required by government to meet their energy objectives. The Proposed Development will, if consented, contribute towards meeting governments energy objectives of urgently delivering renewable energy and utilising existing and available grid infrastructure within the indicated timeframes, in accordance with the intent of NPS EN-1 para. 4.3.22. Section 7.8 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] provides evidence on the efficiency of solar panels and supports the conclusions made in Section 7.7 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] demonstrating that *"large-scale ground-mount solar schemes, including those that are developed with a configuration which maximises annual output, are likely to produce a greater quantity of low-carbon electricity per acre than the output from a crop-to-biogas application. When compared to onshore wind, the energy production from land under solar is of a similar order of magnitude while the environmental effects of solar schemes may be significantly lower.*"
RR-241; RR-414; RR-363; RR-337; RR-261; RR-070; RR-079; RR-310; RR-297; RR-294; RR-214; RR-185; RR-155; RR-151; RR-124; RR-037; RR-067; RR-040; RR-022; RR-152; RR-098; RR-076; RR-008; RR-160; RR-119; RR-171; RR-036; RR-024; RR-355; RR-309; RR-107; RR-084; RR-313; RR-240; RR-227; RR-199; RR-115; RR-	**Need for development:** comments regarding the purpose of the project and the need for the development.	Solar development at scale is needed to help meet the urgent need for homegrown, secure, renewable energy required by Government policy to address climate change and energy security. NPS EN-1 explains at Para 3.3.20 *"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"*, and the government's Clean Power 2030 Action Plan states that to deliver a path to clean power, the government has *"high ambition. That means 43-50 GW of offshore wind, 27-29 GW of onshore wind, and 45-47 GW of solar power, significantly reducing our fossil-fuel dependency.* The **Statement of Need [EN010149/APP/7.1]** [APP-0135] explains at paragraph 1.1.3 that *"Urgent and unprecedented actions are required on a global scale to halt climate change. A rapid increase in the supply of low carbon electricity is needed for the UK to meet its legally binding climate change targets. Solar generation is a critical part of the UK's strategy to achieve net zero by 2050".* Section 6.10 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] describes why large-scale solar is essential to support the UK to achieve Net Zero as set out in Government policy in NPS EN-

RR References	Summary of Issue Raised in RR	Applicant Response
062; RR-099; RR-184; RR-016; RR-374; RR-242; RR-146; RR-135; RR-017; RR-188; RR-030; RR-390; RR-162; RR-303; RR-268; RR-372; RR-350; RR-145; RR-142; RR-039; RR-331; RR-072; RR-332; RR-252; RR-005; RR-448; RR-435; RR-428; RR-405; RR-394; RR-356; RR-342; RR-334; RR-301; RR-271; RR-258; RR-118; RR-102; RR-086; RR-066; RR-054; RR-033; RR-398; RR-366; RR-328; RR-302; RR-254; RR-222; RR-410; RR-333; RR-322; RR-285; RR-282; RR-063; RR-415; RR-010; RR-023; RR-075; RR-351; RR-088; RR-203; RR-319; RR-347; RR-027; RR-045; RR-349; RR-443; RR-104; RR-215; RR-397; RR-221		1 and EN-3, and **Statement of Need[EN010149/APP/7.1]** [APP-0135] paragraph 3.15.7 states that "*To deliver the government' ambition, the equivalent of approximately one large-scale solar scheme would need to be switched on each and every month between now and 2030, between August 2024 and 2030".* The **Statement of Need [EN010149/APP/7.1]** [APP-0135] provides further detail on the need and scale for the Proposed Development.
RR-391; RR-414; RR-363; RR-386; RR-231; RR-151; RR-098; RR-422; RR-359; RR-106;	**Scale of development:** concerns regarding the size of the proposal.	Solar development at scale is needed to help meet the urgent need for homegrown, secure, renewable energy required by Government policy to address climate change and energy security. The scale of development is an important factor, and maximising the generating capacity of

RR References	Summary of Issue Raised in RR	Applicant Response
RR-313; RR-121; RR-287; RR-195; RR-265; RR-259; RR-101; RR-308; RR-367; RR-173; RR-382; RR-182; RR-132; RR-012; RR-371; RR-018; RR-122; RR-270; RR-311; RR-315; RR-202; RR-167; RR-219; RR-137		schemes improves their economic efficiency, bringing power to the market at the lowest cost possible. NPS EN-1 states that decentralised and community energy systems, which by definition include rooftop solar installations, could lead to some reduction in demand on the main transmission system, but "*the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives.*" NPS EN-1 explains at Para 3.3.12 that the connection of large-scale generation facilities via high-voltage transmission systems enables the pooling of generation and demand and enables the efficient bulk transfer of power between areas with surplus and areas in deficit. This is a critical benefit of large-scale systems and supports energy security and system operability. The size and location of the Proposed Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010149/APP/7.2.2]** [AS-018] sets out the reasoning for the Proposed Development, including its size and location. The Proposed Development expects to require 2.4 acres for each MW of output, representing an efficient use of the land for solar PV and associated infrastructure within the range identified in paragraph 2.10.17 of NPS EN-3.
RR-214; RR-080; RR-065; RR-045; RR-036; RR-309; RR-240; RR-144; RR-135; RR-162; RR-268; RR-420; RR-419; RR-082; RR-049; RR-424; RR-368; RR-058; RR-069; RR-075; RR-168; RR-088; RR-177; RR-295; RR-319; RR-442; RR-017; RR-389; RR-379; RR-073; RR-202; RR-167	**Site suitability/site selection:** comments regarding lack of sunshine, suitability of site for solar generation, and need for evidence of site selection.	The Applicant undertook a systematic process to identify suitable sites. Various technical, environmental, and economic factors are considered when investigating and assessing any potential site for large-scale solar developments. The **Site Selection Report** at **Appendix 1** of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development. At the outset, the Applicant aimed to deliver an NSIP scale solar farm to meet the critical national need for low carbon and renewable energy generation. Site selection is driven primarily by: • The availability of a suitable grid connection • Suitable topography and irradiance • The availability of land • Minimising environmental impacts, where practicable, by avoiding designation areas

RR References	Summary of Issue Raised in RR	Applicant Response
		The Applicant considers it reasonable for the site selection process to focus on land in close proximity to a potential connection point as this represents one of the three core attributes required to deliver an NSIP scale solar farm (as set out in the **Site Selection Report** at **Appendix 1** of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018]**)**. Without a point of connection, the electricity generated would effectively have nowhere to go. This approach is supported in NPS EN-3 and helps reduce energy loss, potential environmental impacts in comparison to shorter cable routes and deliverability based on the potential additional number of land interests. As detailed in **Appendix 1: Site Selection Report** to the **Planning Statement [EN010149/APP/7.2.2]** [AS-018], the location of the Proposed Development was chosen partly because the land's characteristics in Lincolnshire are optimal for generating renewable energy by solar PV. The land at this location has suitably high levels of irradiation to support the commercial viability of such development and large areas of flat land. As a whole, irradiance in Lincolnshire is sufficiently high to support solar development. As set out in the **Statement of Need [EN010149/APP/7.1]** [APP-0135]**,** the Proposed Development is located in an area with solar irradiation levels above average for the UK, and initial studies suggest that an average annual load factor before degradation at the site is at least as high as, if not higher than, the current national average.

Table 4-15: Public Rights of Way

RR References	Summary of Issue Raised in RR	Applicant Response
RR-092; RR-107; RR-209; RR-327; RR-146; RR-268; RR-222; RR-164; RR-417; RR-228; RR-167	**Impacts on PRoW:** concerns regarding impacts on PRoW and usage by dog walkers/for recreation.	The Applicant has committed to retaining all Public Rights of Way (PRoW) and provide new routes and connections that enhance and improve the network as part of the Proposed Development. The design of the Proposed Development, including PRoWs, that evolved over the pre-application period is available in the **Design Approach Document [EN010149/APP/7.3.2]**. This resulted in PV modules being set back at least 15 metres from PRoWs, additional screening provided and only located on one side to maintain clear views in at least one direction along all routes. As set out in **ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010] the effects on PRoW users will not be significant and where temporary closures are necessary to

RR References	Summary of Issue Raised in RR	Applicant Response
		facilitate construction activities, these will only be up to six months in duration. The management of PRoWs during construction and operation are outlined in the **oPROWPPMP [EN010149/APP/7.12.2]**

Table 4-16: Socio-economic impacts

RR References	Summary of Issue Raised in RR	Applicant Response
RR-003; RR-171; RR-045; RR-362; RR-238; RR-129; RR-235; RR-376; RR-242; RR-268; RR-260; RR-234; RR-332; RR-259; RR-437; RR-435; RR-344; RR-004; RR-302; RR-105; RR-169; RR-424; RR-042; RR-136; RR-211; RR-167	**Community benefit:** comments questioning the extent to which the local communities will benefit from the proposals.	As summarised in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018], as well as significantly contributing to meeting policy commitments and legal decarbonisation targets for securing renewable energy, the Proposed Development would secure permanent enhancements in order to address concerns about residual adverse environmental effects contributing to physical and mental health pathways. These benefits occur during different stages of the Proposed Development's lifetime. The Proposed Development includes the following other benefits: • Proposed enhancements and improvements to the local footpath and cycle network including the provision of new PRoWs secured in the **Streets, Rights of Way and Access Plans [EN010149/APP/2.4.2]** [AS-005]: - Linking RAF Digby to Scopwick. - Providing a connection between the existing PRoW west of the A15 to New England Lane. - Providing a connection across the A15 by linking Temple Road to Bloxham Woods Car Park. • The creation of four new permissive paths secured in the **Streets, Rights of Way and Access Plans [EN010149/APP/2.4.2]** [AS-005]: - A new permissive path along the western edge of the Proposed Development linking New England Lane to Temple Road, north of Brauncewell (approx. length 4,130m). - A new permissive path connecting the B1191 (Heath Road) with the existing PRoW between RAF Digby and Rowston (Rows/5/1) (approx. length 1,610m). - A new permissive path linking Bloxholm Wood to Brauncewell Village (approx. length 1,120m).

RR References	Summary of Issue Raised in RR	Applicant Response

- New permissive paths to provide a series of circular walking loops from Bloxholm Woods (approx. length 1,720m).

- In addition to this, proposals include the **enhancement of 2km of existing PRoW**, which will attract new users to the area and make this green infrastructure more accessible to local residents and tourists. The overall impact of the Proposed Development on users of PRoW and permissive paths during the operational phase will be slightly beneficial through the creation of new routes, increasing connectivity and access to green spaces within the study area.

- A new community growing area to the north of Scopwick. The community growing area would be located adjacent to existing community facilities along Vicarage Lane (including Scopwick Cemetery, park and play area) and is adjacent to the Spires and Steeples Trail and Stepping Out Scopwick Loop. The community growing area is secured via the **oLEMP [EN10149/APP/7.9.2]** and allows for permissive access 364 days a year to an area of up to 2ha for community use during the operation of the Proposed Development. The detailed design of the space would be developed post-DCO consent in conjunction with the Community Liaison Group.
- Providing a variety of biodiversity benefits including: new habitat for invertebrates, reptiles, amphibians, small mammals and birds; vegetated cover for foraging and dispersal, to maintain bat flight lines across the landscape, and provide a winter seed source for birds set out and secured within the oLEMP **oLEMP [EN10149/APP/7.9.2]**.
  - The Proposed Development commits to delivering a minimum Biodiversity Net Gain of 10% as secured within the **oLEMP [EN10149/APP/7.9.2]**. This has been assessed through **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3]** [APP-095].
  - Provision of an **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153], which will:
    - Increase direct and indirect employment and opportunities;
    - Lever potential of the Proposed Development and other similar schemes in the local area, to encourage the next generation to take up careers in the renewable energy sector and invest their futures in Lincolnshire;
    - Engage effectively with local businesses and wider supply chain, and
    - Assist in development and dissemination of local knowledge and skills relating to renewable energy infrastructure.

RR References	Summary of Issue Raised in RR	Applicant Response
		• The Applicant has an established record of adding legacy value through supply chains and has committed to promoting the delivery of economic benefits generated by the Proposed Development to residents and business. on the Proposed Development and catalysing increased capabilities and specialisms in green construction and manufacturing across Lincolnshire. This is set out within the **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153]. While not a consideration for the SoS, the Applicant is proposing a Community Benefit Fund of £400 per megawatt of installed capacity per year from the start of operation and lasting throughout the lifetime of the Proposed Development. It is envisaged that it would be managed by an independent third party and delivered in partnership with the local community. Local people would be able to advise on the fund strategy and spend, to prioritise issues that are important to the local area. The Applicant has ensured that communities have been engaged throughout the pre-application period. Engagement has been undertaken via the pre-application statutory, non-statutory consultation and bilateral and community engagement processes set out within the Appendices to the **Consultation Report [EN010149/APP/5.1]** [APP-019] that have provided adequate provision of information and consideration of community and stakeholder feedback in the approach to design and assessment development. The Applicant was, and remains, committed to ensuring that everyone had the opportunity to understand the Proposed Development through open and transparent engagement, clearly presented and easily digestible material, the provision of sufficient opportunities for interested parties and delivering consultation that meets legal requirements.
RR-352 **RR-332** **RR-435** **RR-306** **RR-366** **RR-041** **RR-042** **RR-069** **RR-088**	**Impacts on the local economy:** concerns regarding impacts on the local economy.	A small number of representations refer to the perceived lack of economic benefits (including employment, skills and GVA). **ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2]** sets out and assesses the net economic changes relating to agricultural land holdings and employment in existing uses at the Order Limits, and the effect of a short-term, temporary construction workforce and longer-term operational workforce. Overall, the assessment identifies that: • The temporary loss of agricultural land represents approximately 0.3% of agricultural land in Lincolnshire, with an indicative capacity for around 30 FTE jobs based on average employment density.

RR References	Summary of Issue Raised in RR	Applicant Response
RR-114 **RR-237** **RR-239** **RR-393** **RR-196** **RR-343** **RR-221**		• The agricultural economy in Lincolnshire is substantial (supporting around 8,700 FTE jobs) and is subject to annual and seasonal variations in employment supported, which is far greater than the scale of the indicative loss in employment capacity (and actual known employment). • There are two agricultural operations within the study area. During the construction phase, it is expected that both operations will lose access to a portion of the land normally available. The operators of agricultural activities within the Site anticipate that the reduction in operating capacity would be met entirely through retirement and a pause on recruitment, resulting in net loss of employment supported, but no redundancy. • The Proposed Development will support construction employment over the anticipated four-year construction programme. The Applicant estimates that a peak of 650 construction jobs will be supported for a short time, whilst the average number of workforce staff likely to be present on site across the construction phase is approximately 400 FTEs for four years. • The operational (including maintenance) phase would support around 24 FTE jobs, with some periods requiring short-term, temporary iterative increases in on-site personnel for example for nonroutine maintenance of the panels and connectors, site management and environmental management. The employment supported would include electrical engineering roles likely to require higher level skills and qualifications, as well as site management, administrative and process/elementary occupations including security and maintenance The assessment also applies an industry standard approach to additionality, and calculates the net additional effect of workforce spending and supply chain / GVA in terms of monetary value and jobs supported within the local and regional supply chains. To help maximise the positive gain for the local economy from the beneficial effect arising from employment generation during the construction and operational (including maintenance) phase, an **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153] supports the DCO Application. This details commitments to work with partners and the local and regional construction supply chain to enhance the proportion of activities that can be accessed by local people (both in employment, unemployed and economically inactive or outside of the current labour market) and firms with relevant experience and competencies. The main objectives of the **Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20]** [APP-0153] are detailed below: • Demonstrate the use of local labour from within the lead contractor's organisation;

RR References	Summary of Issue Raised in RR	Applicant Response
		• Where economically and practically feasible, procure goods and services from local contractors, sub-contractors and suppliers to support the employment of the local community; • Demonstrate recruitment and training opportunities within the lead contractor's organisation and provide opportunities for upskilling local people; • Provide opportunities for local residents to access employment opportunities created during the construction phase; and • Support the development of skills within the local community. Opportunities for how this can be achieved are being considered but may be delivered through the applicant, main construction organisation, third party organisation or financial contribution to a relevant existing organisation. Through this enhancement strategy, existing workers and firms may be able to up/re-skill to the benefit of the Proposed Development but also supporting their own career development and strategic policy objectives to improve the skills base in green construction sectors that will aid future cumulative demand for similar skills across the Region's renewable energy sector.
RR-098; RR-045; RR-245; RR-128; RR-235; RR-007; RR-234; RR-332; RR-005; RR-052; RR-103; RR-364; RR-136; RR-343; RR-202	**Impacts on tourism:** concerns regarding impacts on tourism and recreation.	A number of representations make reference to concerns about the Project's impact on the local tourism / visitor economy. This is specifically in reference to concerns about: • Changes to the natural environment resulting in fewer visitors, and a reduction in GVA; • Effects on specific (accommodation) businesses reliant on tourism; • Effects on heritage assets; and • Effects on PRoW. As set out in the Scoping Report, the Applicant has recognised that there is the potential for effects relating to tourism resulting from amenity impacts such as visual impacts and impacts to PRoW during all phases of the Proposed Development. **ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2]** provides an assessment of likely significant effects on tourism, setting out (paragraphs 13.5.43 to 13.5.50) the overall scale and volume of the tourist economy within Lincolnshire and North Kesteven, and identifying the primary tourist sector strengths and specific assets which may be affected by environmental change related to the Proposed Development. This notes that the Stepping Out network appears to be of particular significance to the tourist economy and is heavily endorsed by the North Kesteven tourism office, and that the RAF Digby site is located adjacent to the Order Limits, which is a popular tourist attraction associated with the

RR References	Summary of Issue Raised in RR	Applicant Response
		aviation heritage of North Kesteven. However, the majority of tourist receptors are beyond the study area and therefore impacts to amenity or access to/from these receptors during operation (including maintenance) and construction is likely to be minimal. As stated in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] there is extremely limited theoretical visibility of the Proposed Development beyond 3km – as such, the assessment of effects on tourism are also considered across North Kesteven with a focus on effects to tourism receptors within a 3km radius of the Order Limits. The assessment at **ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2]** considers that the construction phase may have effects on the tourist economy as a result of impacts to visitor experience and behaviours, and linked impacts to tourism business receptor performance, resulting from visual and noise construction effects – the environmental effects from other assessments on tourist receptors are summarised from paragraph 13.7.20 to 13.7.27. With regard to users of PRoW, detailed management measures will be subject to agreement with relevant officers within the relevant planning authorities as detailed in the **oPROWPPMP [EN010149/APP/7.12.2].** A detailed PROWPPMP is to be submitted to the relevant planning authorities for approval prior to the commencement of construction works, which is secured in the **Draft DCO [EN010149/APP/3.1.2]**. The Spires and Steeples Trail is part of the Stepping Out network and traverses Springwell East in a north/south alignment. Any works near to this trail and all other PRoW within the Order Limits will be undertaken in line with the **oPRoWPPMP [EN010149/APP/7.12].** It is also noted that the increased level of occupancy that may result from temporary construction workforce will likely mean that accommodation providers see an increase in revenue compared to previous years i.e. without such an increase in people wanting to stay in the area. Workforce staff would likely want to stay overnight throughout all times of year and therefore may provide more income during months that would normally see less occupants wanting to stay. Thus, increases in the level of occupancy can be a beneficial effect for businesses.

Table 4-17: Traffic and transport

RR References	Summary of Issue Raised in RR	Applicant Response
RR-362; RR-161; RR-242; RR-162; RR-268; RR-194; RR-323; RR-406; RR-085; RR-100; RR-322; RR-285	**Construction traffic impacts:** concerns regarding construction traffic impacts on the B1188, A15 and other local roads.	**ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010] and **ES Volume 3 Appendix 14.1: Transport Assessment [EN010149/APP/6.3]** [APP-123] set out the potential for traffic impact. Suitable mitigation measures are outlined in the **oCTMP [EN010149/APP/7.8.2]**. The impact on roads used for construction access re detailed in **Table 14.23** of **ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010]**.** The traffic impact on the A15 varies between 2% and 4% depending upon which section is under consideration. This is well below the threshold for undertaking a detailed assessment (10%). The impact on the B1191 varies between 8% and 20%. Appropriate assessments and mitigation have been undertaken on this road along with the B1188 and Temple Road. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures outlined in the **oCTMP [EN010149/APP/7.8.2]**. Measures detailed in the oCTMP include setting approved access routes for HGV traffic, road signage strategy, a Staff Travel Plan, Community Liaison Group / Traffic Management Working Group, monitoring of the traffic management measures and effective enforcement measures.
RR-416; RR-096; RR-070; RR-385; RR-003; RR-172; RR-098; RR-284; RR-422; RR-107; RR-106; RR-115; RR-421; RR-381; RR-292; RR-235; RR-150; RR-193; RR-332; RR-218; RR-064; RR-004; RR-169; RR-424; RR-019; RR-170; RR-244; RR-276; RR-277; RR-319; RR-196; RR-205; RR-389; RR-122; RR-311;	**General traffic impacts:** concerns regarding increased traffic impacts.	**ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2]** [AS-010] and **ES Volume 3 Appendix 14.1: Transport Assessment [EN010149/APP/6.3]** [APP-123] set out the potential for traffic impact. Suitable mitigation measures are outlined in the **oCTMP [EN010149/APP/7.8.2]**. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures outlined in the **oCTMP [EN010149/APP/7.8.2].**

RR References	Summary of Issue Raised in RR	Applicant Response
RR-315; RR-202; RR-167; RR-137		
RR-134; RR-060; RR-431; RR-236; RR-175; RR-003; RR-075; RR-170; RR-219	**Highway safety:** concerns regarding potential highway safety issues.	The **oCTMP [EN010149/APP/7.8.2]** includes the following measures: • Mitigation measures to ensure the safety of all road users; • Proposals to address road junction safety on the A15 which include visibility and right turn enhancements at various locations and at site access locations; A Highway Condition survey is also contained in the **oCTMP [EN010149/APP/7.8.2]** to ensure that the public highway is in a condition that is safe for all users and all modes of transport. Measures to reduce staff car use during the construction phase are also outlined in the **oCTMP [EN010149/APP/7.8.2]** and would be secured through the construction contract as well as via the **Draft DCO [EN010149/APP/3.1.2]**. Specific measures to address driver behaviours and how these will be addressed throughout the study area are contained in the **oCTMP [EN010149/APP/7.8.2]**. This also includes details of the Community Liaison Group and Traffic Management Working Group, where community issues can be further addressed and discussed. It is also a forum where further specific measures such as potential additional mitigation in places such as Scopwick can also be reviewed, discussed and actioned.

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