

# Springwell Solar Farm

## Written Summary of Applicant's Oral Submissions at the Open Floor Hearing 1 (OFH1)

EN010149/APP/8.15  
Revision 1  
June 2025  
Springwell Energyfarm Ltd

Planning Act 2008  
Infrastructure Planning (Examination  
Procedure) Rules 2010



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Written Summary of Applicant's Oral Submissions at the Open Floor Hearing 1 (OFH1) on 7 May 2025

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## 1. Introduction

- 1.1 This note summarises the oral submissions made by Springwell Energyfarm Limited (the **Applicant**) at Open Floor Hearing 1 (**OFH1**) held on 7 May 2025 in relation to the application for development consent (**Application**) for the Springwell Solar Farm (the **Proposed Development**).
- 1.2 Where the Examining Authority (the **ExA**) requested further information from the Applicant on specified matters, or the Applicant undertook to provide further information during the course of OFH1, that further information is either set out in this document or provided as part of the Applicant's Deadline 1 submissions.
- 1.3 This note does not purport to summarise the oral submissions of other parties, and summaries of submissions made by other parties are only included where necessary to give context to the Applicant's submissions, or where the Applicant agreed with the submission(s) made and so made no further submissions (this is noted within the document where relevant).

## 2. Written summary of the Applicant's oral submissions at OFH1 on Wednesday 7 May 2025

- 2.1 The OFH1 was held at 14:00 on 7 May 2025 as a blended event at County Assembly Rooms, 76 Bailgate, Lincoln LN1 3AR and by virtual means using Microsoft Teams.
- 2.2 Ms Alexis Coleman, on behalf of the Applicant thanked those who made oral submissions. Ms Coleman then stated that many of the issues raised have been raised already in Relevant Representations to which the Applicant is providing a response in Deadline 1 **[EN010149/APP/8.13]**. Ms Coleman also reassured participants that many of the topics raised by the Interested Parties will be explored in more detail at the Issue Specific Hearings.
- 2.3 Ms Coleman acknowledged that given the large-scale nature of Nationally Significant Infrastructure Projects (NSIPs), some adverse effects will be unavoidable, despite the Applicant's best efforts to avoid them. These remaining effects must be weighed by the decision maker against the urgent need for renewable generation and its benefits for energy security and climate change, along with the other significant benefits the Proposed Scheme will deliver, including in respect of construction employment, habitat creation and enhancement to achieve biodiversity net gain, and benefits to existing farms through the diversifying of farm activities and the recovery of soil resources.
- 2.4 Ms Coleman addressed the following key thematic points raised by Interested Parties at OFH1.

### **Impacts on the community**

- 2.5 In response to concerns raised, Ms Coleman said that the Applicant appreciates the potential for the Proposed Development to create impacts on the community including those relating to human health, such as physical health, mental health and well-being. The assessments the Applicant has undertaken consider elements of the Proposed Development which could affect mental health (for example changes in landscape and visual amenity, noise and access to open space) as well as physical health (for example associated with air pollution) **[EN010149/APP/8.10]**.
- 2.6 Ms Coleman noted that the Applicant is conscious that visual impacts may impact mental health and has worked hard to avoid, minimise and mitigate these, for example by minimising impacts to public rights of way (PRoW) through the use of buffers to ensure they are not encroached on by the Proposed Development's infrastructure.
- 2.7 The Applicant is also including a community growing area in response to stakeholder feedback and is creating three new PRoWs, enhancing an existing

PRoW and creating four new permissive paths as recreation and amenity improvement measures.

- 2.8 Ms Coleman added that the Applicant has introduced measures aimed at assisting keep people informed and to reduce anxiety around uncertainty during construction of the Scheme, should it be granted consent, such as a community liaison group during construction.
- 2.9 Ms Coleman said that the Applicant is aware that the Development Consent Order (DCO) application process itself can be confusing or worrying for members of the community. She noted that the Applicant's ongoing consultation and engagement programme has been designed to encourage people to participate in the DCO process and provide regular updates to the local community. This has included, for example, hosting near neighbour design workshops, Relevant Representation workshops, regular community updates, and an on-site surveys web page. In addition, communications channels have remained open to a single point of contact (Rebecca Coleman) since 2022 and continue to stay open through the process. People are able to contact Rebecca, or approach any other members of the Applicant's team, should they need assistance.
- 2.10 Ms Coleman then said that, following comments made at the Preliminary Meeting held on 7 May 2025 at 10:00, the Applicant would host a session to help members of the community participate in the examination process.

**Post hearing note:** The Applicant has now scheduled a number of activities to assist people who wish to participate in the examination process. This includes a webinar for elected representatives on the examination stage, as well as FAQs hosted on the Springwell Solar Farm website and the creation of step-by-step guides for the completion of registration forms. The Applicant has also sought to ensure that members of the community are able to attend the hearings. This includes offering to fund a minibus which would be organised through Scopwick and Kirkby Green Parish Council. As noted above, the Applicant's communication channels remain open to anyone who has a question about the process or would like to discuss the proposals further.

## **Supply chain**

- 2.11 In response to points raised in relation to the origins of the solar panels used in the Proposed Development, Ms Coleman said that wherever the panels are sourced, 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 the Applicant's approach to ethical procurement included in its Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20] [\[APP-0153\]](#).

- 2.12 Ms Coleman emphasised that the Applicant's suppliers of solar panels are subject to a rigorous compliance screening and certification process. Systematic audits of cell and module factories are also undertaken to ensure working conditions meet expected standards. Ms Coleman stated that EDF has also signed up to Solar Energy UK's statement on ethical procurement which applies the highest possible levels of transparency and sustainability.

### **Cumulative effects**

- 2.13 In response to submissions regarding adverse, cumulative impacts, Ms Coleman noted that the Applicant has assessed the cumulative effects with other existing developments in the area, including solar farms, in Chapter 16: Cumulative Effects **[APP-056]**. This assessment considers the potential combined impacts of Springwell Solar Farm alongside other nearby projects and concludes that no significant inter-project cumulative effects are anticipated.

### **Impacts on Amenity**

- 2.14 In response to points raised in relation to loss of amenity, noise and visual impacts, Ms Coleman said that, with proposed mitigation measures in place, noise from equipment is not considered to be significant.
- 2.15 Ms Coleman explained that proposed working hours are set out in the **Outline Construction Environmental Management Plan [EN010149/APP/7.7.2]** for high noise generating plant, and that prior approval would be needed for specific works outside those hours.
- 2.16 Ms Coleman noted that there will be visual impacts during the construction, operation and maintenance, and decommissioning phases of the Proposed Development. Whilst some visual impacts will remain at year 10 of operation, they will largely be screened or filtered by existing vegetation or proposed planting, thus minimising such impacts.
- 2.17 Where the potential for adverse visual impacts has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Proposed Development to reduce these effects as far as practicable. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Outline Landscape and Ecology Management Plan [EN010149/APP/7.9.2]**.

### **Disruption and green spaces**

- 2.18 In response to points made regarding the disruption of access to PRoW and green spaces, Ms Coleman said that all PRoW would be kept open during construction as far as is practicable and safe. However, where it would not be practicable and safe, there may be a requirement for some existing PRoW to be temporarily diverted or closed for the duration of the construction in that area for a maximum time of 6 months. An Outline Public Rights of Way and Permissive Paths

**Management Plan [EN010149/APP/7.12.2]** details how PRow would be managed to ensure the safety of users.

2.19 Ms Coleman added that the Applicant has worked hard to deliver enhancements and improvements during the operation of the scheme, in order to provide and support recreation – the Applicant proposes:

- enhancements and improvements to the local footpath and cycle network including the provision of new PRowS;
- the creation of four new permissive paths;
- enhancement of 2km of existing PRow; and
- a new community growing area with up to 2ha for community use during the operation of the Proposed Development.

2.20 These enhancements are designed to support wellbeing by making green infrastructure more accessible to local residents and tourists, and by increasing connectivity and access to green spaces.

### **Impact on energy bills**

2.21 In response to submissions regarding changes in the cost of energy bills, Ms Coleman noted that the electricity generated from the Proposed Development will be exported to the National Electricity Transmission System (NETS), and provided to consumers via third party electricity companies, which means that the Applicant cannot commit to the provision of cheaper electricity prices for the specific community surrounding the site. Building large quantities of renewable generation in the UK is anticipated to keep consumer costs down by capturing and storing energy when it is abundant (therefore cheap) and releasing it when it is needed. Solar remains one of the cheapest forms of electricity generation available with current technologies. Ms Coleman added that this also means that how and where the electricity is used is out of the Applicant's control and is governed by National Grid.

### **Principle of the Proposed Development**

2.22 In response to submissions regarding the principle of the Proposed Development and solar farms generally, Ms Coleman said that the application for this Proposed Development has to be determined in accordance with the National Policy Statements (NPS) for Energy, and that policy is clear that there is a demonstrated urgent need for large-scale solar projects, and that substantial weight should be given by the Secretary of State to this need. Therefore, whilst the Applicant is aware that many people do not agree in principle that large scale ground mounted solar is part of the solution towards net zero, such submissions go to the merits of the NPS, and cannot therefore be considered as part of this application. Ms Coleman emphasised that this Application is not the forum by which to seek to change Government policy.

## Loss of agricultural land & food security

- 2.23 In response to submissions regarding the loss of agricultural land, Ms Coleman said that, with the exception of the BMV land proposed for ecological enhancements or landscaping, impacts on BMV land will be temporary and reversible and works would be completed in accordance with the **Outline Soil Management Plan [EN010149/APP/7.11.2]** and **Outline Construction Environmental Management Plan [EN010149/APP/7.7.2]** – and upon decommissioning, the land would be returned to the landowner and able to be used for agriculture.
- 2.24 Ms Coleman added that within the site during operation the soil would not experience the usual effects from intensive farming practices. There is also the potential to use the open spaces between the infrastructure and the land beneath the Solar PV modules for sheep grazing.
- 2.25 In response to concerns regarding the impact of the Proposed Development on national food security, Ms Coleman said that, whilst the Applicant understands that food security is a point of interest for Interested Parties, following amendments to the NPPF in December 2024, there is no need to consider food production in land use planning terms.
- 2.26 She added that 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. The Applicant considers that these tests have clearly been met in this case.
- 2.27 Ms Coleman then noted that, 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 estimates the area of BMV agricultural land within Lincolnshire to be over 410,000ha. The Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, and would therefore not have a significant impact. Even when considering other large scale solar projects in Lincolnshire, including Springwell, on a precautionary basis, it is estimated that approximately 2% of the county BMV land resource would be temporarily used on a long term basis.

## Battery Energy Storage Systems (BESS)

- 2.28 In response to submissions regarding BESS, Ms Coleman referred to the Applicant's **Outline Battery Safety Management Plan [EN010149/APP/7.14.2]**, based on best practice management and guidance documents, which comprehensively sets out the management and mitigation in place for the batteries. The Applicant is in discussions with the Lincolnshire Fire and Rescue Service on this Plan.
- 2.29 Ms Coleman noted that this is in line with best practice and current guidance and that Protective Provisions contained within the draft DCO (submitted at Deadline 1) guarantee that the Applicant will host and fund an annual site familiarisation exercise with Lincolnshire Fire and Rescue Service **[EN010149/APP/3.1.2]**.



## Decommissioning

- 2.30 In response to points regarding the life cycle of the Proposed Development, Ms Coleman said that at the end of 40 years, the Solar PV Site will be decommissioned and returned back to its former condition and land use. Any above ground infrastructure will be dismantled and removed per industry best practices. 99% of the Solar PV modules can be recycled. All concrete, hardstanding areas, foundations for the infrastructure and any internal tracks would be removed to a depth of up to 1m. All the below ground cables will be left in situ.
- 2.31 Ms Coleman added that this was secured by a requirement in the DCO in accordance with the **Outline Decommissioning Environmental Management Plan [EN010149/APP/7.13.2]** which is approved by Local Authorities. The Applicant is aware of its obligations in the draft DCO and that it would need to decommission the Proposed Development in line with these requirements, and breach of those requirements would be a criminal offence.

## Flooding / drainage

- 2.32 Responding to submissions in relation to flood risk and drainage, Ms Coleman explained that the Proposed Development has assessed in detail the drainage and run off impacts of the conversion of the Solar PV Site from arable farmland to solar panels in **ES Volume 1, Chapter 15: Water [EN010149/APP/6.1] [APP-055]**. Impacts are proposed to be managed via an Outline Drainage Strategy which sets out the surface water drainage proposals for the Site and has been prepared in accordance with national and local policies. Ms Coleman explained that flood risk has been assessed and the majority of the site is situated in Flood Zone 1. All permanent above ground infrastructure, other than PV panels, is located outside of floodplain extents (Flood Zone 3 and Flood Zone 2), to ensure negligible loss of existing floodplain storage. Solar panels within flood zones 2 and 3 are proposed to be at a specific height in order to address flood risk.

### 3. Summary of specific issues raised by interested parties at OFH1 and the Applicant's response

- 3.1 In addition to the key themes raised by Interested Parties, as responded to by the Applicant in the OFH1 and as recorded above, additional points were raised and the Applicant's response to those points is as set out below.
- 3.2 Comments were made about irrigation, drainage and the aquifer and contamination from Mr Williams and Mr Bourne. The Applicant has addressed these concerns in its response to **Relevant Representations at Deadline 1 [EN010149/APP/8.13]**, in particular at Table 3-6, Table 3-9, Table 3-10, Table 3-12 and Table 4-10 under land contamination and BESS.
- 3.3 Points about pollution of run off from panels were made including from Ms Jackson, who also made comments about the impact of this on ecology and other specific impacts on species. The Applicant has addressed these points in its response to **Relevant Representations** submitted at Deadline 1 **[EN010149/APP/8.13]**, within a series of responses detailed in Table 3-12 of the response. This also covers specific concerns around pollution from broken panels in the watercourse.
- 3.4 Mr Anderson made detailed points about impact on soils. The Applicant has responded to this in part in its response to **Relevant Representations [EN010149/APP/8.13]**, in Table 4-10 of the response. However, it is noted that Mr Anderson raised detailed concerns about soil compaction, degradation and depletion of soil nutrients and concerns over desertification of the soils which are not covered in detail in the Relevant Representation responses as these points were not raised in the representations received. In relation to soil compaction, the **Outline Soil Management Plan [EN010149/APP/7.11.2]** includes measures to keep soil compaction to a minimum and to alleviate compaction resulting from operations. The measures include the exclusive use of lightweight tracked vehicles on grasses over topsoil, only working during suitable weather conditions, when practicable, routine soil plasticity testing to ensure that the soils are only handled when in a non-plastic state, and subsoiling during the restoration phase to remove subsoil compaction beneath the removed hard infrastructure.

In response to the point raised on the concerns over degradation and depletion of the soil nutrients, the Applicant does not expect soil health to deteriorate during the lifetime of the Proposed Development. The soils will be stabilised by the planting of grassland that is currently used for intensive arable production and with soil organic matter likely to increase over time, the Applicant anticipates there to be a slight improvement in soil quality. Following discussions with Natural England, the Applicant has committed to undertaking soil health monitoring during the operation of the Proposed Development. In relation to concerns over desertification of the soil, whilst Solar PV panels will shield limited areas of soil from the rain to some extent, there is no reduction in the total rainfall over any given area. There is no evidence that this results in impacts to the soil beneath the row of panels as water

moves horizontally through crevices and pores within the soil and over the soil surface.

- 3.5 Mr Cox and Mr Bourne made points about various utility assets including the Exolum pipeline and the British Pipeline Agency. The Applicant has provided a response to written question 1.15.4 at Deadline 1 **[EN010149/APP/8.14]** regarding the British Pipeline Agency, which has no assets near the Proposed Development, according to its own website and maps. With respect to the Exolum pipeline, the Applicant has responded to **Relevant Representations** at Deadline 1 **[EN010149/APP/8.13]** and those responses address points raised under the topics military interests and land contamination. Further, the Applicant is in discussions with Exolum in order to secure Protective Provisions for the protection of its assets.
- 3.6 In terms of Hill Top Farm and comments made by Mr Durance about glint and glare effects, the Applicant has updated its glint and glare assessment and submitted this at Deadline 1 **[EN010149/APP/6.3.2]** to include further detail on engagement to date. The Applicant has had a further meeting with Hill Top Farm following the hearings and engagement is ongoing.



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