Springwell Solar Farm

Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1)

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Springwell Energyfarm Ltd

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1. Introduction

1.1.1. This note summarises the oral submissions made by Springwell Energyfarm Limited (the **Applicant**) at Issue Specific Hearing 1 (**ISH1**) held on 8 May 2025 in relation to the application for development consent (**Application**) for the Springwell Solar Farm (the **Proposed Development**).

1.1.2. 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 ISH1, that further information is either set out in this document or provided as part of the Applicant's Deadline 1 submissions.

1.1.3. 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).

1.1.4. The structure of this note follows the order of the items listed in the detailed agenda published by the ExA on 28 April 2025 (the **Agenda**). Numbered agenda items referred to are references to the numbered items in the Agenda. The Applicant's substantive oral submissions commenced at Item 3 of the Agenda. Therefore, this note does not address Items 1 and 2 on the Agenda as these were procedural and administrative in nature.

2. Written summary of the Applicant's oral submissions

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3	**Alternatives and Site Selection**	**3.1 The Applicant will be asked to explain its approach to considering alternative sizes and scales of site for the Proposed Development** The ExA asked the Applicant about its approach to considering alternative sizes and scales of site to the Proposed Development including why sites less than 1,000 acres were not considered. Mrs Sarah Price, Director at DWD, for the Applicant, responded that the Applicant's approach to site selection is detailed in the Site Selection Report – Appendix 1 to **Planning Statement [EN010149/APP/7.2.2]**. She continued that the Applicant has set out how it has complied with Section 4.3 of National Policy Statement (NPS) EN-1 and Section 2.3 of NPS EN-3 in paragraphs 8.1.26-8.1.37 of the **Planning Statement [EN010149/APP/7.2.2]**. Mrs Price noted that in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) the Applicant has considered reasonable alternatives including alternative sizes and scale, where required. She emphasised that the Applicant has complied with the EIA Regulations, but importantly it has only considered reasonable alternatives, which are those that are genuine alternatives that meet the need in the timescales available. Mrs Price explained there is no general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective (para 4.3.9 NPS EN-1). She went on to reference the requirement in paragraph 4.3.15 NPS EN-1 *"Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility."* Mrs Price noted that the requirement is to consider reasonable alternatives that the Applicant has studied, not all alternatives. Mrs Price explained that in the context of assessing utility scale solar projects, there is only a need to consider alternatives which could deliver the same infrastructure capacity in the same timescale (paragraph 4.3.23 of NPS EN- 1).

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Mrs Price explained that the Applicant initially sought to identify sites of 1,000 acres or more, capable of delivering a utility scale solar farm of 250-500MW (based on the rule of thumb of 2-4 acres per MW from NPS EN-3 (para 2.10.17).

The Applicant did not consider smaller sites on the basis that they did not meet the identified objectives, which is consistent with 4.3.23 of NPS EN-1 *"The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development."*

The ExA asked the Applicant if the size and scale it has considered is optimal for solar development, for example, in efficiency or functionality. Mr Si Gillett, Director of Humbeat, on behalf of the Applicant, provided the context that the UK is delivering towards its legal obligations to meet net zero and whilst significant progress has been made in reducing electricity system emissions, more progress is needed. The need for new low-carbon infrastructure is urgent and unprecedented in scale and government has established a mission to deliver clean power from 2030. Mr Gillett explained that the Applicant is preparing an addendum to its Planning Statement, to address the Clean Power 2030 Action Plan statement which was published in December 2024 and the varied National Policy Statements in April 2025.

Post hearing note: this addendum to the Planning Statement has been submitted at Deadline 1 [**EN10149/APP/8.12**].

Mr Gillett described that UK decarbonisation has occurred largely through the closure of coal generation, there being c.10GW 10 years ago and there is now 0GW, but the electricity transmission infrastructure previously used to transmit electricity from historical coal generation locations (many in the midlands) to national demand centres (including London and the south) still exists and its efficient use is critical to the government's net zero plans. He referred to section 3.13 of the **Statement of Need [EN010149/APP/7.1]**

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[APP-0135] which describes the Connections Action Plan (published by Government and Ofgem in November 2023) and how the efficient utilisation of existing networks can defer or negate the need for expensive new infrastructure (and therefore is aligned with net zero objectives). Utilising existing infrastructure which was previously used for coal power is helpful for this. He added that the Applicant seeks to use existing networks infrastructure which has spare capacity, by connecting to and utilising the spare capacity in the existing transmission line shown in the **Statement of Need [EN010149/APP/7.1]** [APP-0135] Figure 8-4, running between West Burton and Bicker Fen National Grid substations.

In terms of the optimum size for solar, Mr Gillett explained that this is a development-specific question (i.e. different developments may have different optimum sizes depending on where they are and where and how they connect to the grid). Large-scale developments bring a large capacity of low-carbon development forwards and therefore deliver a large quantum of benefits towards UK decarbonisation, and can utilise existing infrastructure. He explained that the overhead line between West Burton and Bicker Fen has available capacity and the Proposed Development has sought to make the best use of the available transmission infrastructure and the connection offer that was obtained in order to bring the greatest benefit to net zero aims. He noted that a different scheme in a different location may be brought forwards at a different size/scale but the Proposed Development has been designed to be optimal for this location.

3.2 The Applicant will be asked about the site selection criteria of a maximum of two landowners.

Mrs Price explained that it was reasonable for the Applicant to seek to develop a site with as few landowners as possible, to improve deliverability and reduce the need for compulsory acquisition powers. This is particularly important in the context of national policy on the urgent need for Critical National Priority (CNP) infrastructure projects, including solar. Mrs Price explained that the Applicant initially approached NGET to discuss potential grid connections and then, when NGET identified the overhead line as having capacity, sought to identify appropriately sized landholdings. This resulted in five broad land areas being

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identified. (paragraphs 3.2.1-3.2.13 of the Site Selection Report (Appendix 1 to the **Planning Statement [EN010149/APP/7.2.2]**). Mrs Price noted that from an early stage the land at Blankney Estate performed extremely well against key considerations set out in the Site Selection Report (Appendix 1 to the **Planning Statement [EN010149/APP/7.2.2]**) and the size of the estate also meant that there was a good amount of flexibility for design development and to deliver opportunities for mitigation and enhancement.

She went onto explain that initially the Applicant was working with a single landowner for the solar PV development, however, following further discussions, one additional landowner put forward their land, and the Applicant included it on the basis that it performed well against the site selection criteria and provided additional land to make best use of the grid connection offer.

Mrs Price explained that although the Applicant initially sought sites with a maximum of two principal landowners (for the solar PV development), this was an ambition rather than a hard and fast rule and the Applicant also used their judgement of developing solar farms to identify suitable areas of search. Mrs Price noted that the Blankney Estate stood out from an early stage as an appropriate site for a utility scale solar farm as it had favourable topography, was contiguous with the overhead line, had good accessibility, had relatively limited environmental constraints and was suitably sized to develop a design which was appropriate to its context.

The ExA asked if the Applicant looked at sites with more landowners to see if there were sites using less Best and Most Versatile (BMV) agricultural land or more previously developed land. Mrs Price explained that much of the land in the search area was Grade 2 or 3 BMV land similar to the application site but there is a larger amount of Grade 1 BMV agricultural land to the further east of the Site, and less of it closer to the overhead line. She added that, because of this, in the Applicant's view there were not sites with more landowners that would have decreased the amount of BMV agricultural land. Mrs Price noted the Applicant has done further work to provide further detail on previously developed land in response to the ExQ1 question Q1.2.1 which explains that there were no brownfield sites of sufficient size within 3km

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of the overhead lines. On this basis, even if sites with more landowners were considered, they would not have increased the likelihood of finding a suitable and available brownfield site [**EN010149/APP/8.13**].

In response to a submission from an Interested Party, Mr Gallagher, about areas of land north of Bicker Fen, Mr Gillett explained that there is an unprecedented need for low carbon infrastructure to be connected to the grid and there may be applications for other schemes in development to the south of Bicker Fen, which if they came forward, would be additional schemes and not alternatives. He explained that the combination of national need and the irradiation properties of the site was why it came forwards.

Post hearing note: As set out in the Site Selection Report (Appendix 1 of the **Planning Statement [EN010149/APP/7.2.2]**) the Applicant considered sites within 3km of the West Burton to Bicker Fen Overhead Line (OHL) and Cottam to Eaton Socon OHL as they knew from initial discussions with National Grid that these lines had capacity. The **Statement of Need [EN010149/APP/7.1]** [**APP-0135**] also confirms at paragraph 7.4.31 that "*Existing substations and existing transmission cables with spare transmission capacity, are therefore incredibly important because they provide the opportunity to repurpose existing, therefore largely sunk-cost, infrastructure to connect new schemes to the NETS earlier than would be possible at entirely new connections*." The Applicant was therefore reasonable in focusing its search on an OHL with capacity. The Applicant notes that Heckington Fen Solar Farm, which proposes to connect to the OHL at the existing Bicker Fen substation, secured development consent in January 2025. Other schemes at various stages of development are also proposing to come forward to connect at Bicker Fen, Walpole, Necton and Burwell Main (existing grid substations to the south and east of Biker Fen) and – subject to NESO's Connections Reform and continued successful project development progress – propose to make use of residual available capacity on the existing OHLs which connect through Walpole to Bicker Fen.

In response to a submission from an Interested Party, Mr Elvin, Ms Alexis Coleman, Legal Director at Pinsent Masons LLP, explained on behalf of the Applicant that the Applicant's approach to site selection can be found in the Site Selection Report (Appendix 1 to the **Planning Statement [EN010149/APP/7.2.2]**)

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and **Environmental Statement Volume 1 Chapter 4: Reasonable Alternative Considered [EN010149/APP/6.1]** [APP-044].

Post hearing note: Some Interested Parties made submissions about the location of the Site above the aquifer, which the Applicant confirmed it would respond to in writing. Sensitive aquifers are recorded as being present across the site, with principal aquifers within the Lincolnshire Limestone and Blisworth Limestone bedrock units, and secondary aquifers within the Kellaways Formation, Cornbrash Formation and Rutland formation (all limestone bedrock units) and the superficial Sleaford Sand and Gravel deposits and Head deposits. This information was considered at the time of the site selection. As robust methodology for ensuring the protection of groundwater resources is applied during all stages (construction, operation and decommissioning) for the majority of proposed developments on this scale, the integration of procedures for protecting these resources (whether the most sensitive principal aquifers, or the units that hold water that is not as sensitive), is an accepted norm, and poses no difficulties in ensuring that appropriate measures are secured for the Proposed Development. Such measures are incorporated into the secured management plans for the phases of development (construction, operation and decommissioning), as well as being standard practice for contractors to follow during works. Despite the sensitivity of the aquifers in the Order Limits, the robust measures and methodology to ensure that they are not adversely affected by the Proposed Development are secured within the appropriate management documents, in the: **Outline Construction Environmental Management Plan [EN010149/APP/7.7.2]**, **Outline Operational Environmental Management Plan [EN010149/APP/7.10.2]** and **Outline Decommissioning Environmental Management Plan [EN010149/APP/7.13.2].** This ensures that any risks to these receptors will be minimised. Evidence is provided within the environmental impact assessment (as prepared and presented in **Environmental Statement Volume 1 Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]**) to demonstrate, in accordance with agreed methodology, that there are no residual significant risks to these receptors as a result of the Proposed Development.

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		In response to a question from the ExA, Mrs Price explained that further work was being undertaken in relation to brownfield land and not looking to find other sites with more landowners. **Post hearing note:** This is provided in the Applicant's response to ExQ1 Q1.2.1 and Action Point 1 which confirms that there are no brownfield sites within the 3km search area of either overhead line (Cottam to Eaton Socon and West Burton to Bicker Fen) which meet the minimum site size criteria. Indeed, the largest brownfield sites within any of the Local Planning Authority areas that either overhead line passes through are only 182ha and 33ha respectively, which are both significantly lower than the minimum site size required of 1,000 acres (or 404 ha) and in any case are both being developed for mixed use housing and employment developments.
4	Grid Connection	**4.1 The delivery of the proposed Navenby Substation, its implications for the Proposed Development and its supporting assessments, and whether it should be included in the Order limits** The ExA asked for an update on the progress of the Navenby substation application including the delivery timescales. Ms Coleman explained that the Applicant is in frequent contact with National Grid, and that the Navenby application for planning permission is expected to be submitted in Q4 2025. The Applicant's understanding is that the Proposed Development can connect into National Grid's Navenby substation in Q4 2029. Ms Coleman explained that, as foreshadowed in the Applicant's **Grid Connection Statement [EN010149/APP/7.6.2]**, there has now been an amendment to the connection dates, so that they are now October 2029 and October 2030. Ms Coleman noted that whilst those dates have changed slightly from the Grid Connection Statement, the assumptions in the Environmental Statement (ES) were based on a worst case 48 month construction period that has not changed. The ExA noted that North Kesteven District Council (NKDC) has raised concerns about construction timescales, the validity of the ES and the benefits if the delivery of the substation is delayed. Mr Sheikh further clarified that the point from the Council is about the construction timetable and the impacts on that if there is a delay in receiving permission for Navenby substation. There followed an exchange between

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the ExA and Mr Sheikh to clarify the Council's position, including the ExA confirming there would be a 5 year period in which the Applicant could implement the DCO. NKDC took an action to confirm in writing at Deadline 1 its position in terms of weight to the benefits of the Proposed Development if the connection date was beyond 2030.

Ms Coleman explained that the ES can only be based on worst-case assumptions, which is a reasonable worst case, and there is a check in place via paragraph 2(4), Schedule 16 of the **Draft DCO [EN010149/APP/3.1.2]**. Pursuant to Schedule 16, when the Applicant is discharging requirements, it will need to confirm that the subject matter being approved would not be likely to give rise to any materially new or different environmental effects compared to those in the ES. that as it needs to confirm that it has discharged requirements in line with the ES. In this way, the Applicant is bound by the effects contained in the ES. Ms Coleman reiterated, in terms of weight to be given to the contribution of the Proposed Development to the urgent need for renewable energy generation, that NPS EN-1 paragraphs 3.2.6-8 are clear that the need should be given substantial weight.

The ExA asked the Applicant's view on a requirement in the DCO being tied to construction of the Navenby substation. Ms Coleman explained that paragraph 4.11.8 of NPS EN-1 anticipates and allows for the circumstance in which *"it may not be possible to coordinate applications"* and paragraphs 4.11.8 and 4.11.9 go on to set out what the Applicant needs to satisfy the decision maker of in that situation. Ms Coleman confirmed that the Applicant has addressed the requirements of these paragraphs, including that there is no obvious reason why the application for the Navenby substation should be refused. In this context Ms Coleman confirmed that National Grid has indicated it is pursuing an application for planning permission for the Navenby substation, expected to be submitted in Q4 of 2025, and the Applicant anticipates planning permission being granted, having regard to relevant planning policy. Paragraph 4.11.8 requires an applicant to include information on other elements, and the Applicant has complied with this by providing information about the Navenby substation including as set out in its cumulative **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2]**. Further, Ms Coleman explained that the Applicant has a grid connection agreement with National Grid, and that as the system operator,

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National Grid was under certain obligations to deliver on the grid connection under the agreement in place. Finally, the commercial reality is such that it is not realistic or even likely that there would be a situation in which the Applicant built out the entire solar farm without any grid connection; the situation raised by the Councils is therefore not a realistic one. Ms Coleman referenced the Drax Bioenergy with Carbon Capture and Storage Extension Order 2024 in which a similar requirement was sought, however the Secretary of State found no reason to impose such a requirement in that matter.

Ms Coleman concluded that, having complied with the requirements in EN-1 and provided the confirmation necessary in relation to the National Grid Navenby substation, there was no policy support nor justification for a requirement. In fact NPS EN-1 emphasises the urgency with which schemes such as the Proposed Development need to be delivered, for example at paragraph 4.2.2 "*Our 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.*"

Various submissions were then made from the Councils and Interested Parties. The Applicant's response to those points reiterated the points set out above and for that reason is not repeated here.

The ExA asked if there is a fallback if the Navenby substation is not delivered, and Ms Coleman explained that there is not a fallback, and emphasised that National Grid is obliged to provide a grid connection under its obligations pursuant to the Grid Connection Agreement that is in place.

Post hearing note: National Grid has a commercial obligation under the Grid Connection Agreement to provide a grid connection to Springwell Solar Farm by Q4 2029. The Applicant has provided a response in relation to there being no obvious reasons why planning permission would be withheld for Navenby substation in its response to Action Point 2 submitted at Deadline 1. In addition, based on NGET's Transmission Owner's Licence: Standard Licence Condition D4A: Obligations in Relation to Planning, NGET is required to undertake all reasonable steps to obtain the required consents.

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In response to questions about the Navenby substation being consented separately to the Proposed Development, Mrs Price on behalf of the Applicant explained that the Applicant is in regular engagement with National Grid, and the Applicant understands National Grid's preference to be to consent its own infrastructure, so that it has control over its own consenting process and because the Navenby substation will serve more projects than just the Proposed Development.

The ExA asked the Applicant about National Grid's view that the Navenby substation should be excluded from the Order Limits. Ms Coleman explained that the Navenby substation is included within the Order Limits because the Applicant does not know exactly where Navenby will be located, so it needs to make sure it can connect the Proposed Development into the Navenby substation with cabling. Ms Coleman explained that the cable corridor is the only Works Package (Work No. 5) that is in the area of the Navenby substation, however, the Proposed Development has that whole area included as it needs to physically connect into Navenby. The ExA asked if there are compulsory acquisition rights over that area, to which Ms Coleman confirmed that there are, and that National Grid's interests and the exercise of compulsory acquisition powers in relation to its interests can be protected by protective provisions.

Post hearing note: the Applicant has expanded upon this point further in Q1.6.5 of the responses to **First Written Questions [EN10149/APP/8.14**].

In response to submissions from Interested Parties about the timing of the Proposed Development and the Navenby substation Ms Coleman explained that the Applicant has provided a **Grid Connection Statement [EN010149/APP/7.6.2]** which aims to give confidence in how the grid connection will be provided. This sets out that there has been a grid connection offer and agreement with National Grid to deliver this in connection 2029 and 2030 (noting the dates have changed slightly since the publication of the Grid Connection Statement) and it is under general obligations to do so. Ms Coleman noted there is no policy requirement that the Navenby substation needs to be consented with or ahead of the Proposed Development.

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5	**Cumulative Effects**	**Whether the approach to the cumulative assessment is robust and has captured all relevant other developments, including Leoda Solar Farm. The Applicant will also be requested to prepare an inter-relationship report.** In response to a question from the ExA, Mrs Price confirmed that the Applicant will be submitting an inter-relationship report at Deadline 1 and explained there are five NSIP projects which have the potential for an inter-relationship with the Proposed Development, which the inter-relationship report will cover. The following projects have been identified from the Planning Inspectorate's website and through a website search of consultations: ○ National Grid Navenby substation ○ Fosse Green ○ Leoda ○ Beacon Fen ○ Heckington Fen ○ Lincolnshire Reservoir This list will be kept under review, for example the Applicant understands that two Battery Energy Storage Systems (BESS) projects were submitted to NKDC for validation, which will be reviewed and included as appropriate in consultation with Lincolnshire County Council (**LCC**) and NKDC to agree the projects. **Post hearing note:** the Applicant has provided the Inter-Relationship Report at Deadline 1 [**EN010149/APP/8.11**]. Mrs Price explained the level of interaction between the Proposed Development and other schemes in this location, which is different to the interaction between the Cottam, Gate Burton, West Burton and Tillbridge solar farms, who all have overlapping / shared cable corridors. For the Proposed Development there is much less overlap, as here the cable corridors connecting into the National Grid Navenby

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		substation are anticipated to come from different directions. As a result, Mrs Price explained that there is little opportunity to share cable corridors or mitigation. Mrs Price added that the Beacon Fen, Heckington Fen, Lincolnshire Reservoir projects are much further away geographically to the Proposed Development so there is no overlap with the Order Limits. The ExA asked if Leoda is at a sufficient stage to be considered in the cumulative assessment. Miss Jade Garner, Principal Environmental Consultant at RSK, explained that there is now a Scoping Report for Leoda which provides further information, and the cumulative assessment will be updated with that information at Deadline 1 (see **ES Volume 1, Chapter 16: Cumulative Effects,** [**EN010148/APP/6.1.2**]). In response to a query from Ms Justine Foster, LCC, about the level of detail included for the assessment of the Navenby substation, Ms Coleman noted that from a strict Environmental Impact Assessment (EIA) perspective the Navenby substation would not usually be included in the long and short list for the cumulative effects assessment as it is behind the Proposed Development in planning terms and the Navenby substation application will need to consider the cumulative effects with Springwell. She explained that the Applicant has taken into the account the requirements of NPS EN-1 to include it in the assessment, however the assumptions made are overly precautionary and conservative due to a lack of information. In response to a submission from an Interested Party, Councillor Overton, Ms Coleman explained that the Applicant has complied with the EIA Regulations with a robust assessment of cumulative effects, following methodology and using a list of developments that has been agreed with the Councils. Miss Garner explained that the cumulative assessment is based on a 10km zone of influence which is the largest area where the Applicant foresees impacts.
6	**Air Quality**	**The implications of the PM2.5 Targets: Interim Planning Guidance** The ExA asked how exposure to PM2.5 was considered in the site selection in accordance with the PM2.5 Targets: Interim Planning Guidance. Dr Srinivas Srimath, Air Quality Director, RSK explained that the

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Interim Planning Guidance aims to reduce exposure for the assessment. He continued that the assessment was undertaken using Institute of Air Quality Management guidance and DEFRA guidance and the methodology has been agreed with LCC and NKDC. He noted that embedded mitigation in the design and additional mitigation was assessed so it is mainly a reduction of PM10/2.5. Dr Srimath confirmed that the Interim Planning Guidance was taken into account in the **Environmental Statement Volume 1 Chapter 6: Air Quality** [APP-046] when it was prepared. LCC and NKDC had no comments.

Post hearing note: The Applicant's approach to site selection is set out in Appendix 1 of the **Planning Statement [EN010149/APP/7.2.2]**. This did not specifically take into account exposure to PM2.5 on the basis that there are no AQMAs within or in close proximity of the search area and so this was not considered to be a differentiating factor between alternative sites. The closest current AQMAs to the Site is Nottinghamshire City Council (due to exceedances of nitrogen dioxide) which is approximately 50km west of the Site, and Scunthorpe (due to exceedance in PM10), which is approximately 55km north of the Site. It is also noteworthy that air quality is not one of the matters listed in NPS EN-3 as factors influencing site selection and design of solar farms.

The robustness of the Battery Energy Storage System Plume Assessment.

In response to a question from the ExA about further plume assessments, Ms Coleman clarified on behalf of the Applicant that the **outline Battery Safety Management Plan [EN010149/APP/7.14.2**] commits the Applicant to repeating the plume assessment once the detailed design for the battery has been finalised to confirm effects are not worse than when they were initially assessed.

Post hearing note: in response to a request from the ExA, the Applicant has further considered the wording with respect to the plume assessment in the **outline Battery Safety Management Plan [EN010149/APP/7.14.2**] and updated this at Deadline 1.

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The ExA asked the Applicant about its discussions with the UK Health and Security Agency (UKHSA). Mr Paul Gregory, Battery Safety and Testing Consultant, BST&T Consultancy Services for the Applicant provided an overview of engagement since receipt of the UKHSA relevant representation, which has included an online meeting on 18 March 2025; a draft statement of common ground (SOCG) shared by the Applicant on 4 April 2025; a response from UKHSA to the draft SOCG on 16 April 2025; and a further meeting between the parties on 28 April 2025. Mr Gregory explained that the outcomes of the meeting on 28 April 2025 included that:

1. The SoCG was simplified and agreement was made verbally on all topics.

2. Further information was to be put into an email from the Applicant to UKHSA confirming meeting actions and agreement.

On 1 May 2025 the Applicant provided an email response to UKHSA on various items including a new draft of the SoCG to sign off and technical items and areas of clarification.

Post hearing note: Based on the Applicant's further engagement and updated draft SoCG, on 8 May 2025 UKHSA confirmed its agreement via email with the **Draft Statement of Common Ground - UK Health Security Agency [EN010149/APP/8.6**].

Mr Gregory outlined how the Applicant had responded to each of the points made by UKHSA in its relevant representation, as follows:

Ref 1: Suitability of modelling methodology

UKHSA comment: The criteria used for assessment are related to mortality and therefore do not consider more minor health impacts which may be caused through exposure to a BESS plume.

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- Mr Gregory explained that following the meetings with UKHSA, the Applicant understands that UKHSA would like the detailed design plume assessment (post DCO process) to be based on atmospheric dispersion modelling, thereby understanding what would be emitted and impact on Sensitive Receptors with comparison with air quality standards. He continued that the future running of a plume assessment at detailed design stage is secured in 4.2.11 of the **outline Battery Safety Management Plan [EN010149/APP/7.14.2].**
- Mr Gregory clarified that because of the buffer zones to sensitive receptors, the Applicant is confident that any toxic gas emissions to sensitive receptors will be below relevant public health exposure levels. He continued that the Applicant has presented suitable examples of projects with similar BESS chemistry where fire emissions were below (Acute Exposure Guideline Levels) AEGL-1 levels (<1PPM) at 320m, which is nearer than the closest receptor within the Proposed Development. He noted that this will be checked by the Applicant specifically for the Proposed Development at the detailed design stage.

Ref 2: Suitability of modelling methodology

UKHSA comment: The assessment methodology is not protective of vulnerable people such as children, older adults, and those with pre-existing health conditions.

- Mr Gregory explained the future plume assessment as part of detailed design, will consider the UK Air Quality Objectives and relevant public health exposure levels and standards; it will report against relevant measures and thresholds as deemed by evolving best practise or standards. For instance, the NFCC Guidance updates that are expected to include definitions and considerations of sensitive receptors.
- Mr Gregory noted that as an immediate response to the concern raised, the Applicant is giving the UKHSA full opportunity to interrogate and test the technical data that supports the non-technical summary - **BESS Plume Assessment [EN010149/APP/7.19.2]** – and that the Applicant is waiting for that response from the UKHSA. (As noted in the post hearing note above, the response has

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now been provided and matters agreed in the updated Draft **Statement of Common Ground - UK Health Security Agency** [**EN010149/APP/8.6**]).

- Mr Gregory noted that toxic gas emissions and production of Particulate Matter (PM) in a BESS fire will also be included in the future assessment.

Ref 3: Suitability of modelling methodology

UKHSA comment: PM10 and PM2.5 have been excluded from the plume assessment. Particulate matter would be present in the plume and the potential health impacts should therefore be considered as part of the plume assessment.

- Mr Gregory explained that PM2.5 & PM10 exposure thresholds are not currently set by any standard. He continued that the future plume assessment will consider standards from the UK Air Quality Objectives and Acute Exposure Guideline Levels alongside other guidelines e.g. for visibility etc.
- Mr Gergory explained the Applicant will accommodate UKHSA recommendations that Particulate Matter, Nitrogen Oxides and Benzene, are assessed together with all other significant toxic gases produced by the selected BESS system.
- He noted that based on current assumptions of the BESS chemistry, the gases are likely to include Carbon Monoxide, Methane, HF, and HCl. He continued that the final assessment will be based on a contemporary evaluation of the actual BESS chemistry selected.

Ref 4: Suitability of modelling methodology

UKHSA comment: It is not clear that locally relevant meteorology data has been used in dispersion modelling assessments, nor considered whether topography is relevant.

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- Mr Gregory explained that locally relevant meteorology data has been considered in the current modelling approach, 29 years (uninterrupted) wind data from the Waddington Met Office weather station was utilised in the Plume Study. A worst-case site emission wind speed of 2 m/s and 5 m/s was applied to all directions, not just prevailing south-westerly wind.
- The ExA asked how the windspeed for the assessment was formed e.g. if it was an average. Mr Gregory replied that speeds were representative of worst-case conditions, 2m/s represents typical UK night time conditions and the 5m/s is a typical UK day time speed. Mr Gregory replied that high wind speeds cause toxic emissions to dissipate at shorter distances but can pose a higher risk of fire propagation because of flame tilt effect (when external flames from BESS are "flattened" transferring greater heat flux to adjacent BESS enclosures). Site topography was considered in the plume study, urban or forest terrain with partly cloudy conditions were assumed to be most representative of the Springwell site locations and included in modelling assumptions.

The ExA will ask in the UKHSA's position in writing and Ms Coleman confirmed that the Applicant will submit the **Draft Statement of Common Ground - UK Health Security Agency** [**EN010149/APP/8.6**] at Deadline 1.

Mr Gregory explained that the Plume Assessment does consider the worst-case scenario for life and safety risks to site operatives and first responders within the indicative BESS area layout as well as those in the surrounding area such as workers or local residents. He noted that this was done to satisfy the internal assurance and governance controlling the safe design of the site as well as provide critical information to the Lincolnshire Fire and Rescue Service.

The ExA asked the Applicant about concerns from Interested Parties regarding the time to extinguish a fire including the amount of water available in an emergency. Mr Gregory explained that the Proposed Development in the indicative design and **outline Battery Safety Management Plan [EN010149/APP/7.14.2]** has 4 hours water supply, 1900l of water per minute, which is double the volume for National Fire Chiefs Council Guidelines. He continued that firefighting water is only proposed on

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boundary use to cool adjacent equipment in 15 minute bursts, and water is not discharged on the battery equipment as this can be done with internal suppression systems if these are required to be installed. He noted the peak fire of a typical system may last 1-2 hours maximum and the full burnout time may be 6-10 hours but this is dependent on the state of charge of the battery.

Mr Gregory explained he has worked with battery manufacturers, has conducted burn tests, tested suppression systems, reviewed most BESS system test data on the market and has worked with councils on planning projects. He noted that over 9 years he has tested over 50 different battery designs and is reviewing test data for battery designs on a weekly basis.

In response to questions from Interested Parties, Mr Williams and Mr Guff, Ms Coleman explained that the detailed technology and design will not be in the application, and this is to ensure there is flexibility to adopt up to date technology at the time of detailed design. She continued that there are appropriate parameters and controls, for example in the **outline Battery Safety Management Plan [EN010149/APP/7.14.2]**. The BESS will be subject to detailed design pursuant to Requirement 5 of the **Draft DCO [EN010149/APP/3.1.2]** which includes that it must be in accordance with the Battery Safety Management Plan (which in turn must be substantially in accordance with the **outline Battery Safety Management Plan [EN010149/APP/7.14.2])** and that the relevant planning authority will be responsible for approving the detail under the requirement. Ms Coleman confirmed that this aligns with the approach in all made Orders for BESS co-located with solar to date. Ms Coleman explained that for Lincolnshire Fire and Rescue Service the matters in the SoCG are agreed and it is going through the process of being signed. She continued that the Applicant has also agreed to include protective provisions in the DCO to fund and host an annual site familiarisation exercise and the updated DCO at Deadline 1 will include this (this is provided at **Draft DCO [EN010149/APP/3.1.2]**), which is consistent with other made Orders. She explained that for water runoff, arrangements are in place and the Applicant will explain in writing at Deadline 1.

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		Post hearing note: For further information provided on water runoff, please see responses to ExQ 1.9.9 'Effects of Firewater on Groundwater'. In summary: 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. The drainage system is designed to capture this water during a thermal runaway event, where it can be tested and released or, if necessary, removed by tanker and treated offsite (in consultation with the relevant consultees at the time). Pollution analysis will always be conducted before removing from site (if polluted) or releasing into drainage systems, if safe to do so. Mr Gregory explained that there is new revision to NFP855 coming out next year and there has been a recent change to UL9540A testing protocols. He continued that in the last 12-18 months a number of North American and European government and third-party test facilities have installed large scale test equipment that can capture every gas particle and heavy metal particulates emitted during a thermal runaway process using techniques such as x-ray fluorescence. Mr Gregory explained he has reviewed 10 full scale fire tests which show what gases are emitted and full scale burn/destruction tests with BESS systems placed 150mm-200mm apart with no intervention (e.g. firewater) show that the insulation means that the fire does not propagate between BESS systems. Where there is a high wind speed this can flatten the flames (flame tilt) and put more heat flux through the top of enclosure. In response to a report cited by Interested Parties, Mr Gregory responded to explain that of the two authors quoted in the report, one was involved in Sunnica opposition and one was involved in Cleve Hill and the report extrapolated outlier small scale laboratory tests for that paper. Regarding explosion risks, Mr Gregory explained the safe blast radius defined in NFP855 and recognised by the NFCC as 30.5m, which is only a concern for first responders and site operatives (no risk for off-site receptors). He noted that there are papers available (including the EASE Guidelines on Safety Best Practices for Battery Energy Storage Systems of May 2025) which set out how testing takes place to establish BESS design fire and explosion safety features and how the Applicant is confident at detailed design that all mitigation, protection and risk analysis will have taken place. In response to the comment as to why the BESS design is not identified and secured through the DCO process Mr Gregory explained that the Applicant cannot confirm the BESS system for the Proposed Development now as two more generations of BESS are likely to come through before the Proposed Development is built and any current model would be obsolete before it is built. He continued and

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		explained the precise chemical make-up of a future system from the manufacturers cannot be obtained at this time as a result.
7	Traffic and Transport	**7.1 The Strategic Road Network and the robustness of the Transport Assessment and Cumulative transport effects.** The ExA asked the Applicant for an update in relation to the impact of the Proposed Development on the Strategic Road Network (SRN) and any engagement with National Highways. Mr Gordon Buchan, Sector Director – Energy, Pell Frischmann on behalf of the Applicant, explained that the Applicant has reached agreement with National Highways and a formal SoCG will follow **Draft Statement of Common Ground – National Highways** [**EN010149/APP/8.9**]. **Post hearing note:** The Applicant has provided the **Draft Statement of Common Ground - National Highways [EN010149/APP/8.9]** at Deadline 1. He continued and explained National Highways has no concerns with the adequacy of assessment for the potential for the impacts on the trunk road network, National Highways welcome the commitment to reduce traffic using an enhanced staff travel plan (for staff travel and heavy goods vehicles movements in peak hours as requested by LCC) and agrees that abnormal indivisible load access will be subject of a formal application process, controlled by legislation/permitting. He noted other than this there are no formal queries or matters of disagreement on the SRN. The ExA asked if the Transport Assessment includes Heckington Fen and a development at Sleaford West, or the Navenby substation. Mr Buchan responded that the Navenby substation is included in the **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2]** for the overall assessment but the Applicant understands it has not reached its finalised traffic numbers. He continued and explained that when the developments have confirmed their numbers the Applicant will run a further assessment but it is dependent on when the developers release this information, however, the Applicant can liaise with these developers to seek to obtain this information. He noted that the Applicant will provide some broad

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assumptions if this information is not available toward the end of examination but the assessment that Navenby will provide in its application will include Springwell Solar Farm.

The ExA asked if Leoda will be included in the transport modelling. Mr Buchan explained that if Leoda makes public that information the Applicant will include it, however, the Applicant understands that Leoda's design freeze is not expected until Q4 2025. Mr Buchan noted that if the information is not available the Applicant will make assumptions to include it, if required.

7.2 Matters associated with the level of detail required for proposed Highway Improvements and Site Accesses

The ExA asked the Applicant to respond on the level of detail required for proposed highway improvements and site accesses. Ms Coleman explained that the Applicant has proposed adding drafting into the **outline Construction Traffic Management Plan (CTMP) [EN010149/APP/7.8.2]**, that LCC approve the detailed design of these highway works. Ms Coleman explained that, in relation to highway works authorised under the DCO pursuant to under Articles 10 and 12 of the **Draft DCO [EN010149/APP/3.1.2]**, the Applicant will be including drafting in the outline CTMP to ensure detailed design is approved by LCC and specifically in relation to the junctions it is concerned with, the outline CTMP will provide that a highways agreement pursuant to Article 16 of the dDCO is required. The Applicant understands that this would address the points raised by LCC as to approval of detail.

Post hearing note: This updated drafting has been included in the Outline Construction Traffic Management Plan **[EN010149/APP/7.8.2]** at Deadline 1.

Mr Field from LCC Highways agreed with this position and also asked for Road Safety Audits Stage 1 to be undertaken. Mr Buchan confirmed that a Road Safety Audit and Designer Response for the A15 junctions have been completed and a copy of both have been provided to LCC.

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		Post hearing note: This updated drafting has been included in the **Road Safety Audit and Designer's Response [EN010149/APP/8.18]**. The ExA asked that, given the location of site access are known, can the Applicant explain why full details of accesses and visibility splays are not being provided. Mr Buchan explained they are not provided as it allows flexibility in design to accommodate different construction techniques and vehicles, but the Applicant can provide further information to the Council if needed. Mr Field is comfortable that they can be provided within the boundaries but would like further information now as it could have a further impact on hedgerows which is not a highways impact. Ms Coleman explained that the Applicant will come back on this point but Articles 10 and 12 of the **Draft DCO [EN010149/APP/3.1.2]**, pursuant to which alterations to the layout of the highway would be authorised to create accesses, would also be subject to the detailed design approval mentioned earlier. **Post hearing note:** Please note revised **outline Construction Traffic Management Plan [EN010149/APP/7.8.2].** In response to an Interested Party, Mr Elvin, Ms Coleman explained the ways the Applicant is planning to liaise with the community and noted Requirement 6 of the **Draft DCO [EN010149/APP/3.1.2]**, that there will be a community liaison group, and the traffic management working group in the **outline Construction Traffic Management Plan [EN010149/APP/7.8.2].**
8	Water Environment	**8.1 Implications of the New Flood and Coastal Erosion Risk Data from the Environment Agency for the Proposed Development.** Mr Colin Whittingham, Director at RSK on behalf of the Applicant explained that in January 2025 updated surface water mapping was released which generally shows a slight reduction in areas of flood risk. The majority of the changes are where water was backing up against roads and there are no implications in terms of the Proposed Development.

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Mr Whittingham explained that in March 2025 the Environment Agency produced updated National Flood Risk mapping, which generally shows a reduction in the flood risk extent with the outlines comparable to the hydraulic modelling carried out as part of the assessment. He continued that generally there is minimal change to the assessment. Mr Whittingham noted the Applicant has carried out an initial consultation with the Environment Agency who confirmed that there are no changes needed to the mitigation.

Post hearing note: The **Flood Risk Assessment: Appendix A - Outline Drainage Strategy [EN010149/APP/7.16.3]** has been updated and submitted at Deadline 1.

Ms Jennifer Moffatt, on behalf of the Environment Agency, confirmed that she was content with what the Applicant had set out, and that the Environment Agency would review the updated material submitted at Deadline 1.

8.2. Matters associated with the sequential test for flood risk will be explored with the Applicant.

The ExA asked the Applicant to explain fully why solar PV modules must be located in Flood Zone 3b for operational reasons. Mrs Price explained that the vast majority of Site falls within Flood Zone 1 and was seeking to avoid siting land in Flood Zones 2 or 3, and this approach can be found in the Site Selection Report (Appendix 1 to the **Planning Statement [EN010149/APP/7.2.2]**). She continued that there were areas of lower flood risk considered by the Applicant, however these were discounted because they were less suitable when other planning, environmental and design factors were considered, for example reducing impacts on the setting of Scopwick and RAF Digby.

Mrs Price explained in terms of the location of solar in Flood Zones 3b the Applicant was seeking to maximise the capacity of solar that could be delivered within the agreement with National Grid. She continued that the areas of Flood Zones 2 and 3 are small areas on edges of fields so were considered suitable from a planning and environmental perspective. The Applicant has had discussions with the

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Environment Agency who are content to see solar in those areas and there is no sensitive electrical infrastructure (central inverters, Springwell substation and Collector Compounds) located in Flood Zones 2 and 3. Accordingly the Applicant is satisfied that the approach follows paragraph 5.8.10 of NPS EN-1 which shows that flood risk areas are being appropriately discounted, accounting for wider sustainable development objectives.

The ExA asked if the solar panels are critical to the operation of the plant. Mrs Price answered that although it is not critical to the operation of the plant for there to be panels in precisely this location, they can only be located where there is sufficient capacity to connect projects to the National Grid (as set out in the **Statement of Need [EN010149/APP/7.1]** [APP-0135]) and so to this extent there is an operational reason for them being in this location and in maximising renewable energy generation. The Applicant has considered other available land at lower risk of flooding and discounted it, taking into account wider sustainable development objectives, and so this renewable energy capacity cannot be located elsewhere. NPS EN-1 only provides that projects should not normally be consented in Flood Zone 3b rather than that they should never be and that the Applicant's justification in the **Planning Statement [EN010149/APP/7.2.2]** is sufficient. The Applicant confirmed it would expand on this point further in writing.

Post hearing note: The Applicant's further written response to this is provided in the Solar Panel Siting Assessment, Flood Zone 3b as Appendix 2 to the **Planning Statement Addendum** [**EN10149/APP/8.12**] submitted at Deadline 1.

The ExA asked if the extant planning permission was a realistic fall back permission and if the permission could be implemented if development consent for the Proposed Development was not granted. Mrs Price indicated that in the absence of the Proposed Development the extant planning permission could be implemented and therefore does signify a realistic fallback position in planning terms.

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		Post hearing note: The Applicant undertook to respond further on this point in writing and has now done so at Deadline 1 in response to Action Point 11 and the associated appendices, which provide details of the extant permission and its extent of overlap with the Proposed Development. In response to a submission from an Interested Party, Mr Jenkins, Mr Whittingham explained that the run off from the panels is a very localised issue. Each panel will result in runoff at the toe of the panel, followed by a rain shadow where no precipitation falls. The result is no net change in the runoff across the PV areas. Where there are impermeable areas, such as for the BESS area, there will be drainage systems put in place to manage any additional runoff which will be designed at the detailed design stage in discussion with the relevant Councils.
9	**Cultural Heritage**	**9.1 The extent of assessment stage archaeological trial trenching, archaeological investigations post-DCO and Requirement 11 of the draft Development Consent Order** The ExA asked whether any trial trenching is planned during the examination period. Ms Coleman replied that it is not because the Applicant considers the trial trenching undertaken to date to be appropriate, proportionate and targeted and in line with the policy in NPS EN-1 and NPS EN-3, and therefore adequate for the purposes of the assessment. Mrs Jen Richards, Archaeology and Built Heritage Consultant, Headland Archaeology (part of the RSK group) for the Applicant further explained that the approach is proportional, in line with emerging best practice that intrusive archaeological work can be inherently damaging to remains, which comes with its own carbon footprint and is disruptive to the operational use of the land. She noted that best practice is to minimise intrusive work during examination and do further work in order to inform detailed design and mitigation. Officers on behalf of LCC and Historic England provided comments on the assessment, with LCC confirming that the trial trenching undertaken had been proportionate and that the County was content with the trial trenching undertaken for the assessment, and that their focus was on asking for more information as to what is planned as part of the Proposed Development and working on an appropriate mitigation strategy. Historic England's comments were focussed on the desk based assessment, and

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similarly its focus in terms of additional information from trial trenching was on that being undertaken pre-commencement. Ms Coleman welcomed comments from both parties and noted that the **outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]** is under discussion. She continued that the Applicant has gone back to LCC with revised wording of Requirement 11 in the dDCO in response to comments from LCC and in order to secure additional trial trenching, to secure an update to the written scheme of investigation with the results of that evaluation, and to ensure the results inform mitigation and detailed design. Mrs Richards explained that there are ongoing discussions with the two local authorities regarding the scope of work of the **outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]** to set out the work and have shared comments on Requirements 5 and 11 of the **Draft DCO [EN010149/APP/3.1.2]**. She noted that there have been discussions on how to synthesise the intrusive and non-intrusive evaluations that will inform the **outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]** which the Applicant is aiming to submit at Deadline 2.

Ms Allen on behalf of LCC explained that LCC disagrees with the trigger for the requirement (referring to the proposed drafting making it applicable to Work Nos. 1-6), however, the remainder of the requirement was acceptable in principle. **Post submission note:** the Applicant has provided its updated wording of Requirement 11 in the **Draft DCO** [**EN10149/APP/3.1.2**] at Deadline 1 and will continue discussions with LCC and Historic England in this respect.

9.2 The level of detail in the analysis of above ground heritage assets.

Mrs Richards for the Aplicant gave a brief overview of the submission in January which was **ES Volume 3, Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2]**, Appendix 5 of the Planning Statement, Heritage Harm Statement (which describes non-significant effects to built heritage) and **ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.3.2]** (which corrected some errors). Further detail in relation to above ground heritage assets is included in the response to questions 1.7.2 and 1.7.3 which form part of the Examining Authorities **First Written Questions** [**EN10149/APP/8.14**]. Agreement has been reached with LCC,

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		NKDC and Historic England regarding the majority of these assets with discussion ongoing regarding effects on Scopwick Mill and Thompson's Bottom Farm. In response to an Interested Party, Councillor Overton, Mrs Richards on behalf of the Applicant explained that there is a risk of remains on any archaeological site, but for the Proposed Development this risk is minimised by the evaluation work undertaken. The Applicant is in discussion with LCC about whether it is appropriate to have an archaeologist on site during construction, which would be an outcome of the **Outline Written Scheme of Investigation [EN010149/APP/7.15]** [APP-0148] and any subsequent mitigation strategies.
10	**Landscape and Visual Effects**	**10.1 Assessment methodology, study area and photomontage viewpoint selection** In response to a question from the ExA on potential plant growth failure, Mr Alex Van der Nelson, Director, LDA Design explained the Aplicant has set out growth rates in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] which assumes at year 10 of the Proposed Development hedgerows will be a height of 3.5m, with woodland and scrub at 4m. Section 7 of the outline Landscape and Ecology Management Plan [**APP-0142**] sets out how the Applicant plans to monitor those habitats which will be done at years 1, 3, 5, 10 and 15. The detailed Landscape and Ecology Management Plan will be updated every 5 years by a qualified ecologist/landscape architect and where the Landscape and Ecology Management Plan is not being met, action will be taken to rectify this e.g. replacement planting, which includes a 5 year replacement planting period. The **outline Landscape and Ecology Management Plan [EN010149/APP/7.9.2]** is secured by the **Draft DCO [EN010149/APP/3.1.2]**. **10.2 The approach to the residential visual amenity assessment** Mr John Ingham, Landscape Planning Director, RSK explained that he is a Chartered Landscape Architect with 25 years' experience in Landscape and Visual Impact Assessment (**LVIA**) and has undertaken numerous Residential Visual Amenity Assessments (**RVAAs**) and that the RVAA at **ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3]** [APP-111] has been

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prepared in accordance with recognised guidance: TGN 02/19: Residential Visual Amenity Assessment, published by the Landscape Institute.

Mr Ingham explained the purpose of RVAA, noting that the Applicant's study goes one step beyond the requirement in EIA to identify significant effects because the planning system is concerned with the public interest and RVAA is concerned with private visual amenity. He continued that the process of following the guidance has four steps in it, the first three broadly corresponding to the process of visual impact assessment in LVIA. He explained that RVAA goes one step further to identify whether effects on residential amenity at a property are judged to be so 'oppressive' or 'overbearing' that when judged objectively in the round the property would widely be regarded to become an unattractive place to live. He continued that this is a much higher threshold than the identification of significant adverse effects as recorded in the ES and this test is referred to as the 'Residential Visual Amenity Threshold' in the Landscape Institute TGN 02/19 guidance. Mr Ingham explained that there is no guidance on what constitutes an 'oppressive' or 'overbearing' effect on private visual amenity and that this can be a subjective matter. He noted the judgement therefore needs to be undertaken objectively as far as possible by a qualified and professional person drawing upon professional expertise, previous experience, precedent and any relevant appeal decisions, high court judgements etc.

Mr Ingham explained that before production of the Preliminary Environmental Information Report (PEIR) he visited the majority of the properties in the study area and his initial findings fed into the design of the Proposed Development. He continued that the judgements presented in the RVAA at **ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3]** [APP-111] regarding whether the residential effects take account of the view from not just the property itself but also the curtilage, approaches to and exiting the property and different parts of the property etc. He explained that taking all of this into account based on his professional judgement he came to the conclusion that no residential property would exceed the threshold, so no property would experience a visual effect that was so overbearing that it would make the property and unpleasant or unattractive place to live.

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The ExA asked about year 1 and year 10 and if the RVAA judgements apply to both years. Mr Ingham explained that the assessment takes account of mitigation, so there is a judgement where the effect has reduced the effect by Year 10 as well, but the judgement is made on both the year 1 and year 10 scenario.

The ExA asked if the RVAA takes account of glint and glare in terms of views. Mr Ingham explained that residential amenity in the broader sense can incorporate things beyond visual such as noise and AQ, which glint and glare would fall under, but the RVAA itself does not cover glint and glare and the Applicant will respond to that question in writing.

Post hearing note: The **Planning Statement [EN010149/APP/7.2.2]** summarises the conclusions of the glint and glare assessment on dwellings in paragraph 8.14.12 and 8.14.13 which is that for 99 of the dwellings where solar reflections are geometrically possible, existing and proposed vegetation, buildings, terrain or other screening is predicted to obstruct views. For the remaining dwellings, marginal views from above ground floor levels are considered possible. The duration of effects are predicted to be experienced for less than three months per year and less than 60 minutes on any given day. Therefore, in accordance with the assessment methodology, a low impact is predicted for these dwellings and not considered significant. Furthermore, the Applicant has committed to anti-reflective/anti-glare coating in accordance with paragraph 2.10.134 of NPS EN-3. Paragraph 8.14.25 of the Planning Statement finds that in compliance with paragraph 2.10.158 of NPS EN-3, the Proposed Development results in no unacceptable impacts to dwellings as a result of glint and glare. This is then taken into account with other matters in the overall planning balance. The policy compliance tables (Appendix 3 of the **Planning Statement [EN010149/APP/7.2.2]**) also confirm the position that: "*It is considered that the wider benefits of the Proposed Development, including the delivery of a significant level of low carbon energy generation and biodiversity net gain and the provision of permissive footpaths and outweigh these impacts and that the Proposed Development is considered acceptable in terms of overall landscape, visual and residential amenity impacts and the nature of the visual impacts are not considered to outweigh the benefits of the Proposed Development*."

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In response to a submission from an Interested Party, Mr Jackson, Ms Coleman explained that if consent is granted for the Proposed Development it would be authorised by a development consent order (**DCO**) which is a piece of secondary legislation and it is a criminal offence if the Applicant does not comply with the DCO. The ExA asked the Applicant to explain in writing how the DCO requirements and the control documents secure the monitoring and maintenance of the growth of planting to ensure screening.

Post hearing note: This is answered by the Applicant's response to Q1.10.21 of the First Written Questions [**EN10149/APP/8.14**].

In response to submissions from Interested Parties, Mr Williams and Councillor Overton, Mr Van der Nelson explained the Applicant's approach to good design. This is set out within the **Design Approach Document [EN010149/APP/7.3.2]** which demonstrates how the design has been developed accordance with the criteria for good design set out in NPS EN-1. In particular, how the Applicant has undergone an iterative design process which has considered consultation feedback, environmental surveys, environmental assessment and technical studies to ensure an appropriate design response. Mr Van der Nelson continued that the Applicant has used Project Principles to drive design related decisions at each stage of the design process which is documented in the **Design Approach Document [EN010149/APP/7.3.2]**. For example, Principle 1.3 has guided the Applicant to consider sequential views and the experience of people using local roads; Principle 2.2 has ensured the Proposed Development responds local character, and Principle 2.3 has ensured the Proposed Development maintains the rural separation between local villages. He noted there was discussion from Interested Parties about hiding the Proposed Development and Mr Van der Nelson stated it is not appropriate to seek to screen or "hide" the development in all areas. For example, the Applicant is not suggesting it will be hidden all the way along the A15 as there are other mechanisms that can be used to demonstrate an appropriate design response. For example, providing appropriate offsets to sensitive receptors, omitting solar panels from certain fields to breaking up their mass, incorporating earth bunds etc. all of which can be found in the **Design Approach Document [EN010149/APP/7.3.2]**.

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11	**Procedural Decisions, Review of Actions and Next Steps**	The ExA listed the actions from the hearing. The Applicant has provided a response to all actions allocated to it.

Appendix 1
Response to Action Points

Application Document Ref: EN010149/APP/8.16
Planning Inspectorate Scheme Ref: EN010149

1. The Applicant's written submissions in response to Action Points

Table 1.1 below sets out the list of action points that arose during the hearing and the Applicant's post-hearing response to them.

1.1. Action points arising during the hearing and the Applicant's post-hearing responses

Action Point	Applicant's Response
Action Point 1: To provide further information in relation to the consideration of brownfield land in the wider site selection search area.	The Applicant has provided a response to FWQ 1.2.1(b). In response, the Applicant considered all brownfield land within the 3km search area of the West Burton to Bicker Fen and Cottam to Eaton Socon OHLs, which is shown at **Figure 1**. The Applicant has reviewed the brownfield registers for each of the local authority areas that pass through the 3km search area, and there are no brownfield sites which are of a sufficient size to meet the minimum size threshold. Indeed, the largest brownfield site within the 3km search area is 12.57 hectares which is significantly below the size required to deliver a utility scale solar farm. In addition, the largest brownfield site across all seven local authority areas that the West Burton to Bicker Fen OHL passes through (even outside of the 3km search area) is 33.63 hectares, which is still significantly below the minimum site size of 1,000 acres (approximately 404 hectares). This site is Welbeck Colliery and is approximately 32km west of the West Burton to Bicker Fen OHL in Bassetlaw Council and has planning permission for a mixed housing and employment scheme, with outline permission granted in 2015 (reference 15/01037/FUL) and reserved matters in 2023 (reference 23/00983/RES). In addition, the largest brownfield site across all thirteen local authority areas that the Cottam to Eaton Scoton OHL passes through (even outside of the 3km search area) is 189.72 hectares, which is still significantly below the minimum site size of 1,000 acres (approximately 404 hectares). This site is Wixams New Settlement and is approximately 18km south-west of the Cottam to Eaton Scoton OHL in Bedford Borough Council and has planning permission for a built development consisting of mixed-use residential, employment, retail, leisure and community uses, open space and associated uses together with supporting infrastructure (roads, paths, cycleways, pumping

Action Point	Applicant's Response
	stations, electricity substations), public transport, interchange and car parking, with outline planning permission granted in 2006 (reference 99/01645/OUT) and a number of subsequent planning application granted since. Even if brownfield sites were available, these are also required to deliver much needed homes and employment and if they were also suitable for renewable energy, the need is such (see **Statement of Need [EN010149/APP/7.1]** [APP-0135]) that these sites would be needed as well as the Proposed Development, not instead of it. The Applicant would like to reinforce that there is no legal or policy requirement to demonstrate that the Proposed Development is the best location for a solar farm. However, it is an appropriate location for a solar farm, and there are certain policy preferences, for instance, considering previously developed land before greenfield land and lower quality agricultural land before higher quality land. Appendix 1 to the **Planning Statement** - **Site Selection Report [EN010149/APP/7.2.2]** [AS-018] explains the process undertaken by the Applicant in considering these important factors. There are also certain legal and policy tests regarding the consideration of alternative sites, for instance where there would be an adverse effect on the integrity of a European protected site, which is not engaged in this case, the consideration of land within the areas of flooding, which is assessed within this document, or where land is proposed to be acquired compulsorily. In this case, the Applicant aims to secure the principal land parcels to deliver the solar farm through a voluntary agreement and enters into option agreements with willing landowners. However, compulsory acquisition powers are still being sought to ensure delivery.
Action Point 2: To provide further evidence to show	As discussed in ISH1, as set out in agenda no. 4 of **Written Summary of Oral Submissions at Issue Specific Hearing 1 [EN010149/APP/8.16]**, the Navenby substation and overhead

Action Point	Applicant's Response
that there are no obvious reasons why the Navenby substation application or consent for the required overhead powerlines would be refused and therefore would not act as impediments to the delivery of the Proposed Development.	powerlines required to connect the Proposed Development to the National Grid will be subject to a planning application to be submitted to North Kesteven District Council. An Environmental Impact Assessment (EIA) Screening request has been submitted, which confirmed that EIA is required, and NGET has confirmed that it intends to submit the application in Q4 2025. When the application is submitted, it will be determined in accordance with the Development Plan and any material considerations, including the National Planning Policy Framework (NPPF) as the starting point and the National Policy Statements (NPSs) EN-1, EN-3, and EN-5. At the local planning level, the Central Lincolnshire Local Plan (April 2023) provides policy support under Policy S16: Wider Energy Infrastructure, which endorses significant investment in new and upgraded energy infrastructure. This includes upgraded or new electricity facilities such as transmission facilities, substations, and other related infrastructure, particularly where they contribute to the transition towards a net-zero carbon sub-region. Although the policy supports such infrastructure in principle, successful planning consent will depend on a thorough assessment of the application against these planning policies and any site-specific considerations. As there is currently no plan available for the proposed substation in the public domain, this assessment cannot yet be carried out, but NGET has a number of principles in relation to the design, siting and mitigation for substations which seek to avoid, reduce and mitigate potential harm and are considered below. Policy S16 of the Central Lincolnshire Local Plan emphasises that all reasonable steps must be taken to mitigate any potential harm that may arise from these developments. This includes the selection of an appropriate site and the incorporation of design solutions, as detailed in Policy S53, to minimise environmental and community impacts. The design and siting of the proposed Navenby substation would be expected to adhere to the Horlock Rules, established by National Grid, which require that proposals for new (and extended) substations consider residential amenity and take steps to minimise intrusion into

Action Point	Applicant's Response
	surrounding areas. Based on information on the National Grid Navenby substation project page, NGET has undertaken a formal substation siting study, which shortlisted five possible sites. From these five evaluated sites in the local area, a rigorous optioneering process was carried out, taking into consideration the impact on the local community, proximity to the existing overhead line to reduce the need for new pylons, environmental factors, land availability and other key measures. Through consideration of all these factors, the site 1.4km from Navenby was selected as the most suitable location. It is clear therefore that the Development Plan supports the provision of the Navenby substation (and any associated lines necessary to connect it to the network) in principle. On the basis that National Grid will be following the Horlock Rules, it should be possible to satisfy the requirements of this policy. Policy S53 relates to design and amenity and requires development in general to achieve high quality sustainable design that contributes positively to local character, landscape, townscape, and supports diversity, equality and access for all. Whilst the substation would be detailed designed post-consent, there is a requirement for balancing technical considerations with the wider environmental constraints and other considerations, in accordance with the Horlock Rules, including landscape and landscape fabric. NPS EN1, EN3 and EN5 will also be important material considerations in any decision. This includes the new substation as defined in the glossary under Critical National Priority (CNP) infrastructure under low carbon infrastructure, for which there is an urgent national need. The starting point in favour of CNP infrastructure (as set out in the **Planning Statement [EN010149/APP/7.2.2]** paragraphs 3.2.3-3.2.6) may also apply as a material consideration to the application for the Navenby substation.

Action Point	Applicant's Response
	In addition to local policies, NPS EN-1, paragraphs 4.11.5 to 4.11.9 emphasise that the Planning Act 2008 encourages a holistic approach to planning, aiming to combine related project elements into a single application or coordinated submissions to improve efficiency and reduce environmental impact. However, if separate applications are necessary due to differing timelines, legal entities, or regulatory frameworks, applicants should explain the reasons and confirm there are no clear obstacles to the approval of other project elements. The National Grid Substation will serve other customers and has a duty to fulfil its responsibilities to all the customers with a grid connection agreement with the Navenby Substation. Applicants must also ensure that their submissions comply with EIA regulations, addressing indirect, secondary, and cumulative effects. Given the generally supportive national and local policy position, as described above, and on the basis that NGET take a responsible approach to siting, design and mitigation, following the Horlock Rules, there are no obvious reasons that consent for the Navenby substation and associated overhead lines to connect it into the national grid would be withheld.
Action Point 3: North Kesteven District Council to comment in its Local Impact Report on any changes in weight that should be afforded to the benefits of the Proposed Development if the construction of the [Navenby] substation is delayed.	*Directed to North Kesteven District Council.*

Action Point	Applicant's Response
Action Point 4: To provide an Interrelationship Report that considers all relevant developments, including Leoda Solar Farm; and a revised Cumulative Assessment, to include Leoda Solar Farm and any other relevant developments.	The Applicant has provided the **Interrelationships with other Nationally Significant Infrastructure Projects and Major Development Schemes [EN010149/APP/8.11]** at Deadline 1. The Applicant has updated the Cumulative Assessment to take into account the Leoda Solar Farm (EN0110016) for which the EIA Scoping Report was submitted in January 2025. At Deadline 2, a full update of the inter-project long and short lists will be undertaken, with an assessment cut-off of 30 May 2025. The same process will be repeated for Deadline 4 as necessary with an assessment cut-off of 29 August 2025, or at other times as may be requested by the Examining Authority.
Action Point 5: Councillor Overton MBE to provide details of any developments that you consider could have a cumulative effect on the character of the landscape.	*Directed to Councillor Overton MBE, Lincolnshire County Council.*
Action Point 6: To provide a note or revision to the application document(s) to explain or make clear how the revised Plume Assessment, once the battery technology is known, is secured in the	The **BESS Plume Assessment [EN010149/APP/7.19.2]** has been updated at Deadline 1 to address this point.

Action Point	Applicant's Response
draft Development Consent Order.	
Action Point 7: To provide the Stage 1 Road Safety Audits for the indicative junction improvement schemes.	A **Stage 1 Road Safety Audit and Designer's Response [EN010149/APP/8.18]** for the A15 junctions has been prepared and has been submitted at Deadline 1 Included is the Designer Response to the audit. No significant safety issues have been raised.
Action Point 8: To revise the application documentation to ensure that Lincolnshire County Council sign-off any highway improvement works.	Drafting has been added to the **oCTMP [EN010149/APP/7.8.2]** at Deadline 1 to address this point.
Action Point 9: To provide an updated Flood Risk Assessment following new Flood and Coastal Erosion Risk data that was published by the Environment Agency.	Drafting has been added to the **Flood Risk Assessment [EN010149/APP/7.16.3]** at Deadline 1 to address this point.

Action Point	Applicant's Response
Action Point 10: To provide a written submission to explain why solar panels must be located in Flood Zone 3B for operational reasons and a map with supporting evidence that demonstrates why it is not possible for solar panels to be located in areas of Flood Zone 1, either within the Order Limits or directly around it.	A response to Action Point 10 is provided in the **Planning Statement Addendum [EN010149/APP/8.12]** under Appendix 2 Solar Panel Siting Statement, Flood Zone 3b, provided at Deadline 1.
Action Point 11: To provide further evidence to demonstrate that the suggested fallback extant permission for the solar farm on the application site is directly comparable to the Proposed Development, and would be delivered if the Proposed Development were to be refused development consent.	Planning permission was granted on 25th September 2014 for the development of a solar photovoltaic power generating installation with associated 132kv substation, transformer/inverter stations, internal access tracks, security fencing and landscaping, on land to the north-east of Scopwick and west of west of the railway line (reference 14/0937/FUL) ("the extant solar permission"). The plan at **Appendix 1** shows the areas with planning permission for solar panels through the extant consent and the extent of overlap with the Proposed Development. A variation of condition was granted on 15th July 2016 (reference 16/0410/VARCON) relating to landscaping and biodiversity, Great Crested Newts, an archaeological evaluation scheme, wheel washing and protection of trees and hedgerows. Works to formally implement the consent were carried out between September-October 2017 and this was confirmed by the issue of a Certificate of Lawful Development (reference

Action Point	Applicant's Response
	21/1024/LDEXI) on 4th October 2021. It is the landowners' intent that should the DCO not be granted, they would continue to implement the extant solar permission. The Officer's Report to Committee for the extant solar permission considered flood risk and drainage. It confirmed that: • The vast majority of the site lies within Flood Zone 1, with a proportion of the eastern site (northeast and southeast corners) is located within Flood Zones 2 and 3. • Solar farms are classified as "essential infrastructure" as defined in table 2 of the Technical Guidance Note to the NPPF, and Table 1 of the guidance indicates that "essential infrastructure" is a suitable form of development to be located within Flood Zones 1 and 2. • Where essential infrastructure is located within Flood Zone 3a, the NPPF requires the Exception Test to be passed. This concerns whether the development provides wider sustainability benefits to the community that outweigh flood risk. • Consultation has been undertaken with the Environment Agency who have raised no objection subject to the inverters being located outside Flood Zones 2 and 3, and on the basis that the land between the rows will be sown with a grass seed mix so that the ground is permeable, and that new access tracks are constructed using a permeable surface. The applicant in this case then submitted revised plans to demonstrate that both of these requirements had been met. • Officers are satisfied that there are clear wider sustainability benefits stemming from the increased production of a substantial amount of renewable energy, and which outweighs the residual flood risk to areas of the eastern site. • As such, Officers are satisfied that the Exception Test has been addressed in this instance. A condition was imposed on the extant solar permission to ensure that the development is carried out in accordance with the following flood risk mitigation measures.

Action Point	Applicant's Response

- The inverters are to be located outside Flood Zones 2 and 3.
- The land between the rows will be sown with a grass seed mix so that the ground is permeable and surface water run-off is limited.
- Access tracks will be made from a permeable material so that surface water run-off is limited.

As confirmed in the Officer's Report to Committee, the EA were consulted on the application for the extant solar permission and confirmed that they had no objections to planning permission being granted on the basis of the flood risk mitigation measures being secured.

Flood risk matters were therefore clearly understood and addressed in the application.

The plans submitted with the application showed that the panels consented through the extant solar permission are a maximum of 2.5m in height to the top of the panel, with a minimum of height of the lowest part of the solar panel of 0.8m above ground level, and a minimum of 3.2m spacing between panels. The application was also accompanied by a planning and framing detail plan and a masterplan, which showed panel layout, and was approved through the extant solar permission (see plans included at **Appendix 2**).

This compares to the proposed parameters for the Proposed Development of a minimum spacing between rows of 2.5m, a maximum height of 3.5m in areas of floor risk and a minimum height of the lowest part of the solar panel above ground level of 0.8m.

Although the maximum height of the extant solar permission is lower than that envisaged by the Proposed Development, the scale of solar that would be allowed across the overlapping areas is similar and, in some fields that include areas in Flood Zones 2 and 3, is significantly higher than the scale of the Proposed Development in these areas – for instance the extant

Action Point	Applicant's Response
	solar permission allows solar across the whole of field By20, whereas the Proposed Development does not propose any solar panels in this field. There are two very small areas of solar panels in the Proposed Development in Flood Zone 3b which does not overlap with the extant solar permission – these are in fields By03 and By04 to the north of Springwell East. These areas are however very small and lesser in extent than the area in field By20, which would no longer be developed for solar if the DCO was granted. It is also relevant that the extant solar permission would allow solar in fields closer to Scopwick and to this extent is less preferable when considering wider sustainable development objectives. To this extent, the Proposed Development is preferable in flood risk terms than the extant solar permission, as it proposes less development in areas of flood risk. The landowner has agreed that should the DCO for the Proposed Development be granted, it will not continue to implement the extant consent, to avoid any issues relating to overlapping planning permissions. The ExA can therefore be confident in this scenario that the remaining parts of the extant solar permission which are outside of the Order Limits for the Proposed Development would not be built out. On this basis, it can be concluded that the extant solar permission represents a realistic fallback position which would be implemented should the DCO for the Proposed Development not be granted, and is therefore a material consideration when considering compliance with the Sequential Test and Exception Test.
Action Point 12: To provide the revised wording for draft Development Consent Order	The Applicant has provided revised drafting for Requirement 11 in the draft DCO submitted at Deadline 1. In terms of an update on discussions with LCC and Historic England the wording of the revised draft Requirement is largely agreed but there is ongoing discussion as to part

Action Point	Applicant's Response
Requirement 11, along with an update on discussions with Lincolnshire County Council and Historic England in relation to archaeological matters.	(1) which currently reads "no part of Work Nos. 1 to 7 may commence until for that part...". LCC request that this be extended to all Work numbers, this matter is under discussion. The current draft Requirement reads: (1) No part of Work Nos. 1 to 7 may commence until for that part: (a) a written scheme of investigation has been submitted to and approved by the relevant planning authority in consultation with Historic England; (b) any additional trial trenching required pursuant to the approved written scheme of investigation to inform the approach to mitigation has been carried out in accordance with the approved written scheme of investigation; and (c) where additional trial trenching to inform the approach to mitigation has been undertaken under sub-paragraph (b) updates are made to the written scheme of investigation approved under sub-paragraph (b) to account for the results of the additional trial trenching carried out and such updated written scheme of investigation has been submitted to and approved by the relevant planning authority in consultation with Historic England. (2) The written scheme of investigation under sub-paragraph (1)(a) must be substantially in accordance with the outline written scheme of investigation. (3) For the purposes of sub-paragraph (1), "commence" includes parts (a) to (h) inclusive of the permitted preliminary works. (4) Any approved written scheme of investigation (whether pursuant to sub-paragraph (1)(a) or (1)(c)) must be implemented as approved and maintained throughout the construction of the authorised development and any archaeological works or watching brief must be carried out in accordance with the approved scheme.
Action Point 13: North Kesteven District Council to set out in its Local Impact Report which	*Directed to North Kesteven District Council*

Action Point	Applicant's Response
above ground heritage assets that have not been scoped into the assessment should be and why.	
Action Point 14: Lincolnshire County Council to provide further commentary on potential effects on non-designated heritage assets in its Local Impact Report.	*Directed to Lincolnshire County Council*
Action Point 15: To provide evidence to explain how the monitoring and maintenance of screening planting growth is secured through the draft Development Consent Order.	The **oLEMP [EN10149/APP/7.9.2]** sets out the short and long-term measures and practices that will be implemented by the Applicant to establish, monitor and manage landscape and ecology mitigation and enhancement measures embedded into the Proposed Development. The **oLEMP [EN10149/APP/7.9.2]** has been updated by the Applicant to address comments raised in relation to monitoring and maintenance (including Action Point 15) and will be re-submitted at Deadline 1. Section 7 of the **oLEMP [EN10149/APP/7.9.2]** provides information on the monitoring of new tree and hedgerow planting. It states that these will be monitored in years 1, 2, 3, 5 and 10 to ensure they reach the target heights set out in Section 10 of the **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050]. For hedgerows, the target height is at least 3.5m with a width of at least 1.5m at 1.5m above ground level by Year 10. For woodland and scrub, the target height is at least 4m by Year 10.

Action Point	Applicant's Response
	An indicative works schedule for management of new tree and hedgerow planting is set out in Appendix 3 of the **oLEMP [EN10149/APP/7.9.2]** which will be further developed within the LEMP(s) at the detailed design stage. Each LEMP will be submitted and approved by the relevant planning authority in accordance with Requirement 8 of the **Draft DCO [EN010149/APP/3.1.2]**. Section 7 of the **oLEMP [EN10149/APP/7.9.2]** states that there will be a full review and update of the detailed LEMP(s) every 5 years by a suitably qualified ecologist and landscape architect. Where the delivery of the detailed LEMP(s) is not being met for whatever reason(s) appropriate action will be identified and taken to rectify failings. This may entail making changes to specification of planting species if these are failing to establish successfully, including additional planting and/or replacement planting for planting that has failed to establish. Equally, where successes are identified, these would be promoted further and lessons learned from both success and failure fed into the next iteration of the detailed LEMP(s). Section 6 of the **oLEMP [EN10149/APP/7.9.2]** states that detailed LEMP(s) will include a 5 year defects replacement planting period which is common practice for landscape maintenance contracts. Should the DCO be granted consent, detailed LEMP(s) will be produced for the Proposed Development in accordance with Requirement 8, Schedule 2 of the **Draft DCO [EN010149/APP/3.1.2]** and must be substantially in accordance with the **o oLEMP [EN10149/APP/7.9.2]**.

2. Further action points arising during the hearing and the Applicant's post-hearing responses

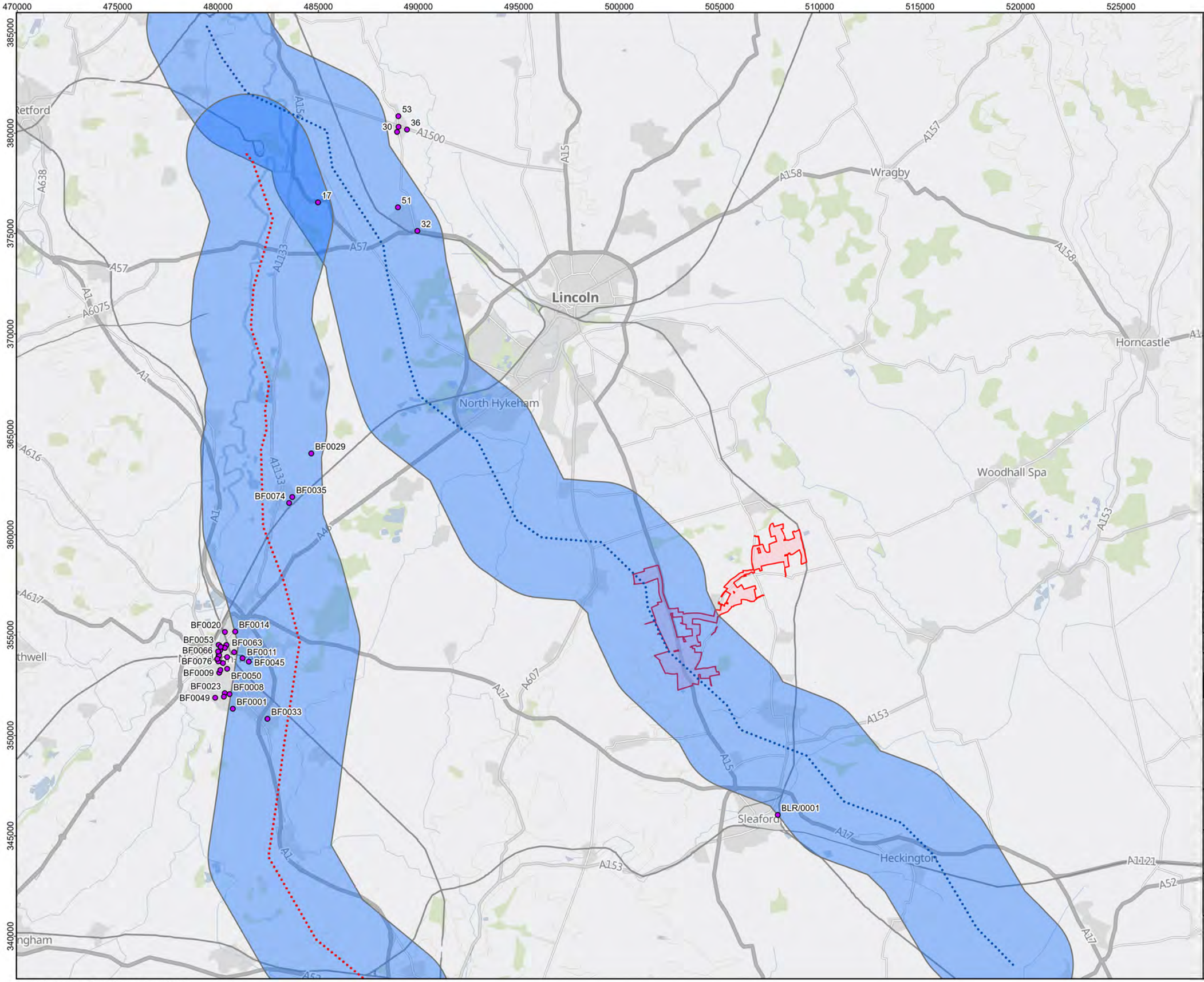
In addition to the Action Points identified by the ExA above, the Applicant has subsequently identified additional points during ISH1 where it committed to providing the ExA with further information in writing. The Applicant considers it appropriate to address these points, and as such the table below sets out the Applicant's written submissions in respect of these further action points.

2.1. Further action points raised during the hearing and the Applicant's post-hearing response

Action Point	Applicant's response
Further Action Point 1: Applicant to explain why full details of accesses and visibility spays for site accesses are not being provided.	Full detailed design and visibility splay drawing details are not provided at present as it allows the Applicant some flexibility in design to accommodate different construction techniques and vehicles. The proposed process for highway works approval however does allow Lincolnshire County Council the ability to undertake a full technical review process at the appropriate time, prior to works commencing on the proposed highway works. This process is set out in the **oCTMP [EN010149/APP/7.8.2]**.

Appendix 2
Action Point 1 Figures

Application Document Ref: EN010149/APP/8.16
Planning Inspectorate Scheme Ref: EN010149



LEGEND:

- Order Limits
- Overhead power line - West Burton to Bicker Fen
- 3km site search for OHL - West Burton to Bicker Fen
- Overhead power line - Cottam to Eaton Socon
- 3km site search for OHL - Cottam to Eaton Socon
- Brownfield Sites within or close proximity to the 3km site search

NOTES:

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter

Rev	Date	Description	Drn	Chk	App
01	JUN 2025	DEADLINE 1	LDA	AA	AA

Springwell Solar Farm

DOCUMENT:
RESPONSES TO FIRST WRITTEN QUESTIONS

TITLE:
FIGURE 1, SHEET 1 OF 3
BROWN FIELD SITE SEARCH

PINS REFERENCE NUMBER:
EN010149/APP/8.13

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Kilometers

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REV P01

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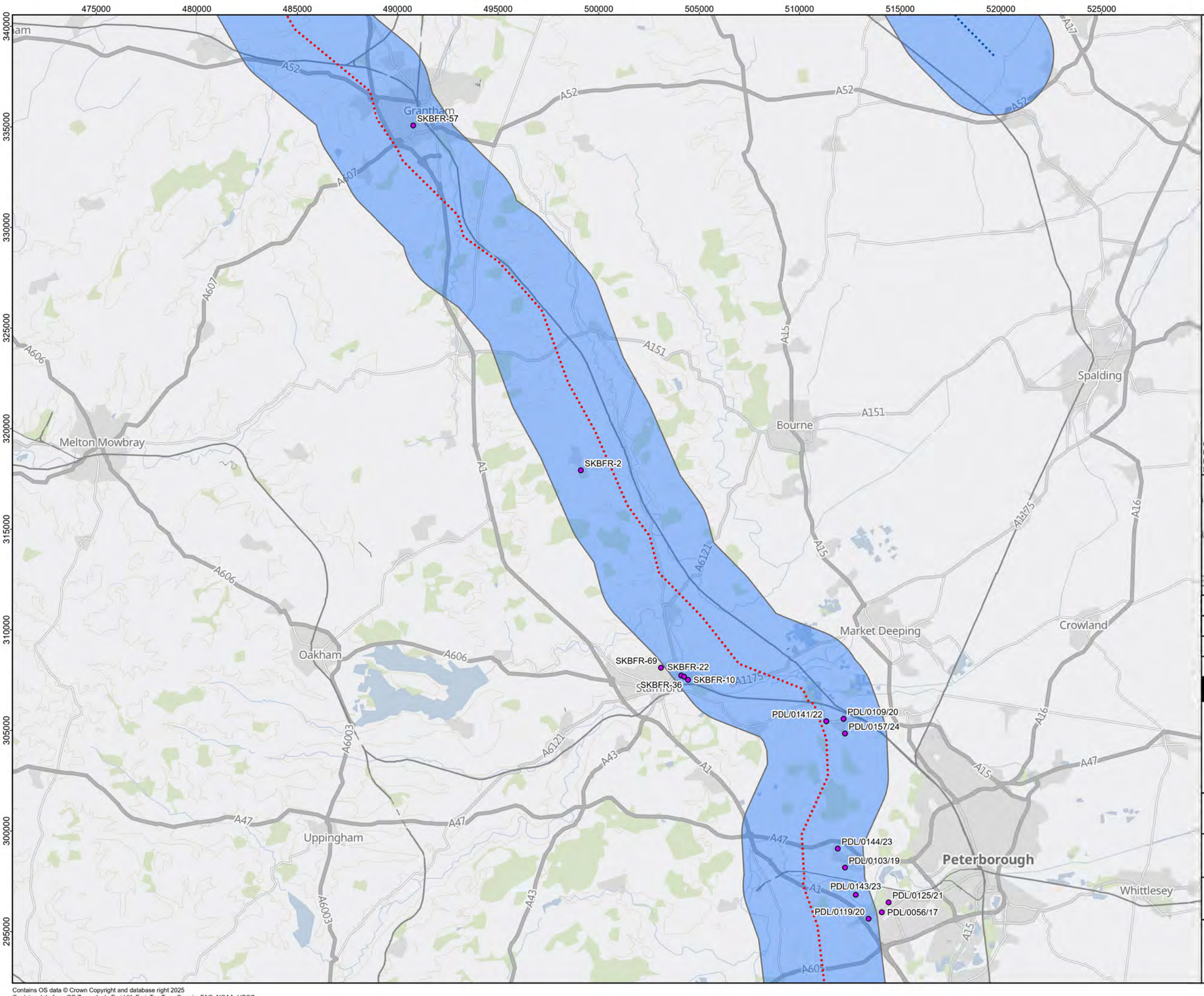

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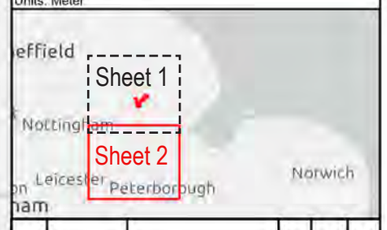
Units: Meter



Rev	Date	Description	Drn	Chk	App
01	JUN 2025	DEADLINE 1	LDA	AA	AA

Springwell Solar Farm

Springwell Solar Farm

DOCUMENT:
RESPONSES TO FIRST WRITTEN QUESTIONS

TITLE:
FIGURE 1, SHEET 2 OF 3
BROWN FIELD SITE SEARCH

PINS REFERENCE NUMBER:
EN010149/APP/8.13

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REV P01

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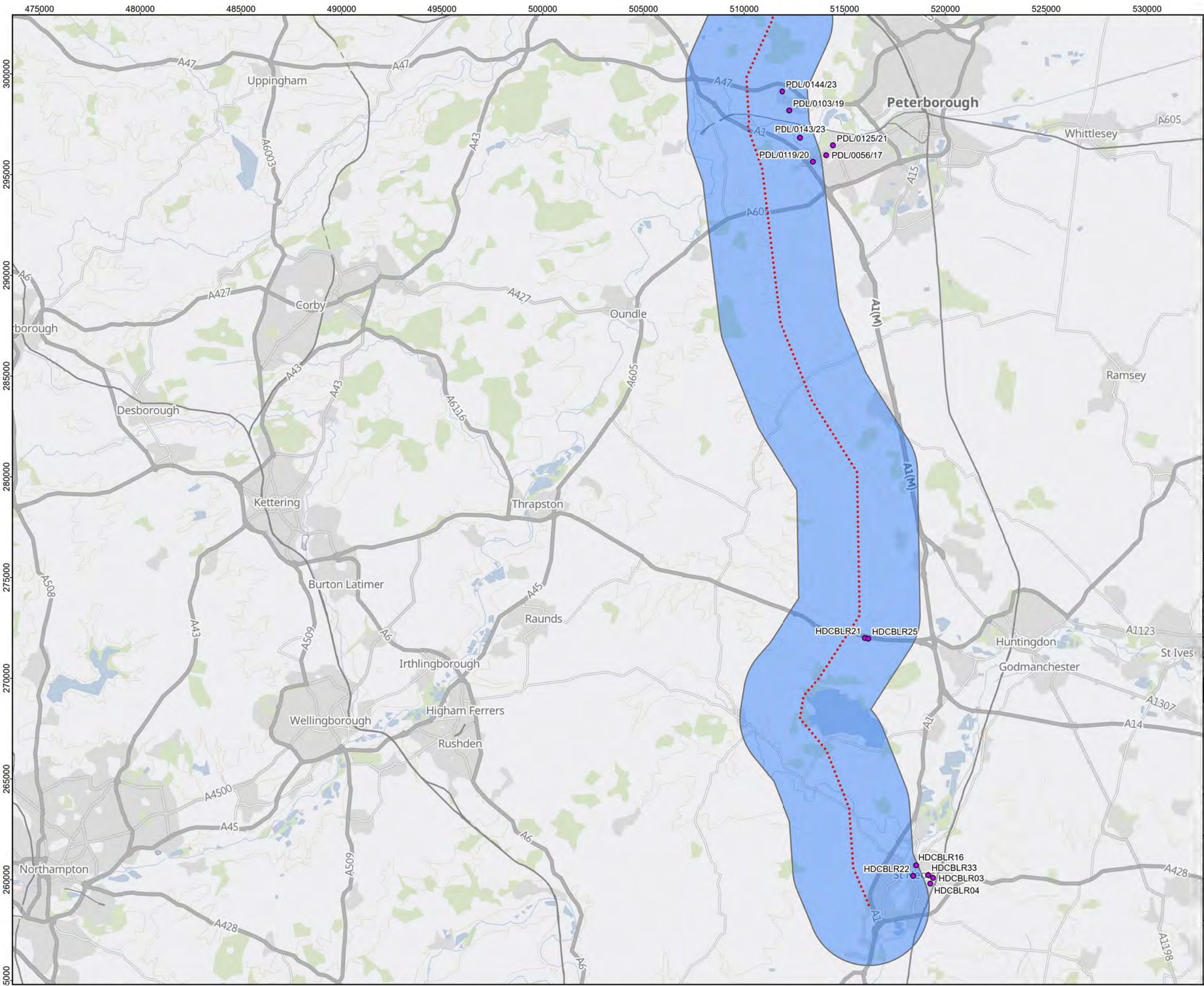

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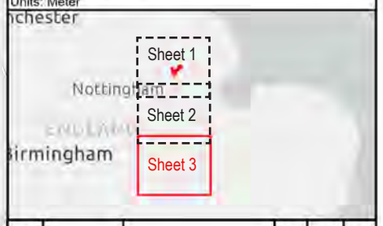
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter



Rev	Date	Description	Drn	Chk	App
01	JUN 2025	DEADLINE 1	LDA	AA	AA

Springwell Solar Farm

Springwell Solar Farm

DOCUMENT:
RESPONSES TO FIRST WRITTEN QUESTIONS

TITLE:
FIGURE 1, SHEET 3 OF 3
BROWN FIELD SITE SEARCH

PINS REFERENCE NUMBER:
EN010149/APP/8.13

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Kilometers

Scale: 1:175,000 @ A3

REV P01

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Appendix 3

Action Point 11 Appendices

Application Document Ref: EN010149/APP/8.16
Planning Inspectorate Scheme Ref: EN010149

LEGEND:

- Final Order Limits
- Solar PV Development
- Town and County Planning App Approved Area
- Flood Zone 3b

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter

Rev	Date	Description	Drn	Chk	App
00	16/04/2025	First Draft	FA	HH	JG

Springwell Solar Farm

DOCUMENT:

TITLE:
Flood Zone 3b, TCPA, and Proposed Development Extent

FIGURE NUMBER:

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Kilometers

Scale: 1:14,000 @ A3

REV 00

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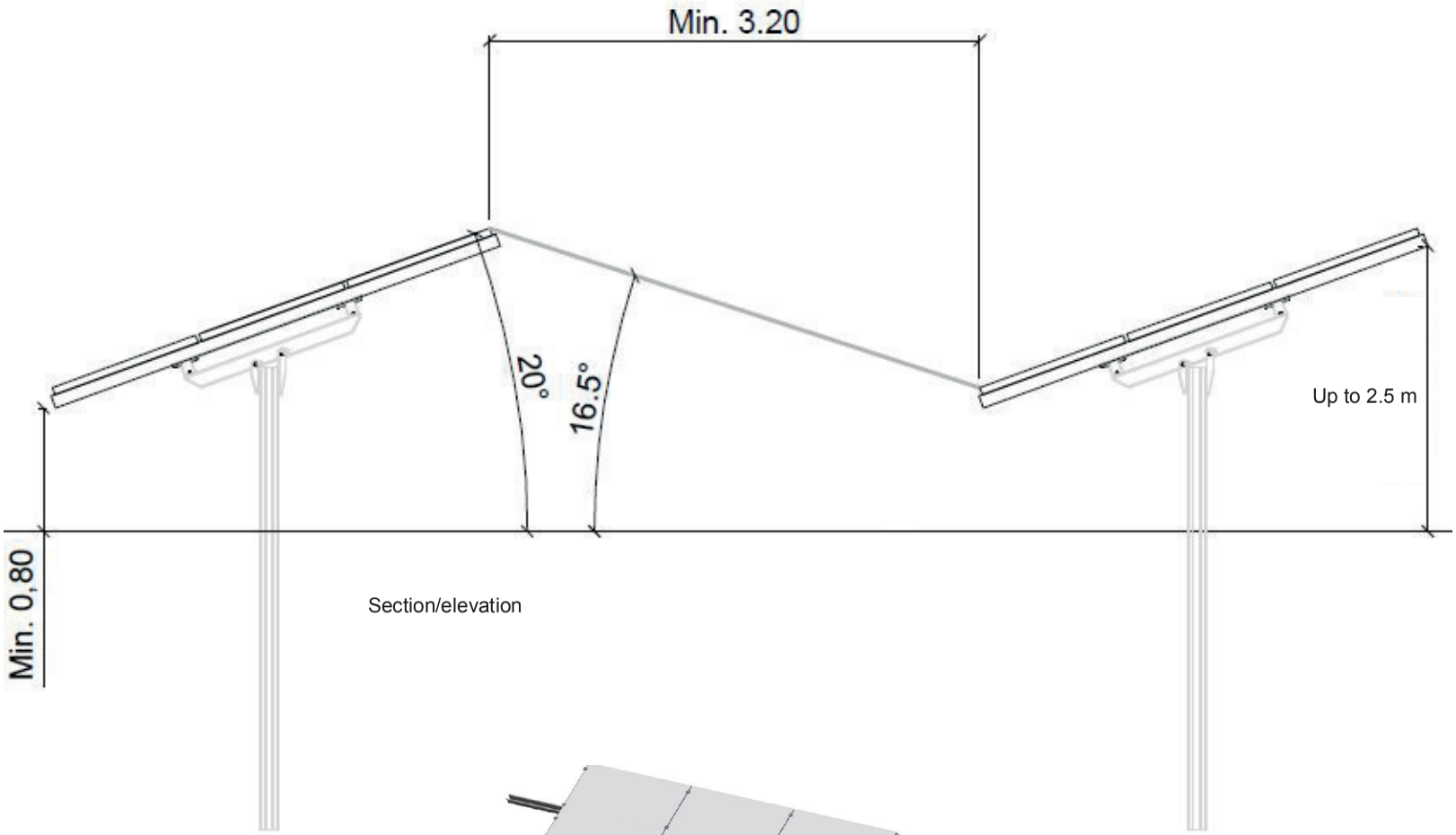

Section/elevation

Axonametric

N

0 10m

sightline LANDSCAPE

Sightline Landscape Ltd,
57 Stirtingale Road, Bath BA2 2NG

ON BEHALF
Hazel Capital

PROJECT
Proposed ground mounted Solar PV array, Blankney Estate near Scopwick

TITLE
Panel and framing detail

SCALE	DATE	DWG NO.	APPROVED
1:50 @ A4	27.06.14	05 PA D1	CM

Blankney

Existing woodland

Existing woodland

Proposed hedgerow along northern boundary

Security fencing

New permissive footpath to run along west side of the existing hedge for the duration of the operation of the solar farm only

Security fence

Site boundary

Solar PV panels (south facing)

Owners metering housing

Inverters

Access track

East block temporary contractors compound

Underground electrical connection

7m wide screen of perennial, annual flowers and grass

Overhead electricity/utility lines

Temporary contractors compound

Access track

Inverters

Water pipeline

Public Right of Way (PRoW)

Proposed hedgerow

Location of an interpretation board

Security fence

Site boundary

Solar PV panels (south facing)

Proposed hedgerow

Proposed hedgerow on east side of the track to block views to the sub-station

Owners metering housing

Underground electrical connection in suitable gap across the lane

Temporary contractors compound

Proposed 132KV substation

Access

Existing hedge reinforced with new planting

New terminal towers, cables realigned

New permissive footpath to run along west side of the hedge for the duration of the operation of the solar farm

Hazel Coppice

Existing tower removed

New permissive footpath

7m wide screen of perennial, annual flowers and grass

Existing gaps within the hedge to be infilled and hedge thickened

Scopwick

0 500m

NB: Maximum peak output 49.85mw

NB: The existing public rights of way will remain in place giving users the choice of passing alongside the solar park using the existing track and PRoW or along a permissive path where the solar park will be screened by an existing hedge

Revision	Date	Comments
A	26.08.14	Inverters moved out of the flood zone
B	28.08.14	Additional permissive footpaths added
C	29.08.14	Sub-station area altered

sightline LANDSCAPE

Sightline Landscape, 57 Stirtingale Road, Bath BA2 2NG

M [redacted]

E [redacted]

W [redacted]

ON BEHALF

Hazel Capital

PROJECT

Proposed Solar PV Scheme, Blankney Estate, Lincolnshire

DATE 16th Aug 2014

SCALE 1: 5,000 at A1L

DWG NO. SL110/100 C

APPROVED CM

TITLE

Masterplan

Springwell
Solar Farm

springwellsolarfarm.co.uk

Application Document Ref: EN010149/APP/8.16
Planning Inspectorate Scheme Ref: EN010149