

Springwell Solar Farm

Draft Statement of Common Ground

– North Kesteven District Council

Rule 8(1)(e)

EN010149/APP/8.2

Deadline 1

June 2025

Springwell Solar Energy Farm Ltd

Planning Act 2008

Infrastructure Planning (Examination
Procedure) Rules 2010

1. Introduction

1.1 Overview

- 1.1.1. This Statement of Common Ground ("SoCG") has been prepared in respect of the application for the proposed Springwell Solar Farm Development Consent Order ("the Application") made by Springwell Energyfarm Ltd ("the Applicant") to the Secretary of State for Energy Security and Net Zero under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2. Springwell Solar Farm is a proposed new solar farm and battery storage facility located in North Kesteven, Lincolnshire. The proposals also include infrastructure to connect Springwell to the National Grid, as well as any necessary supporting site infrastructure and environmental mitigation, including landscaping and ecological planting ("the Proposed Development").
- 1.1.3. This SoCG is being submitted to the Examining Authority as an agreed draft between both parties. It will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by the Applicant and North Kesteven District Council (NKDC). NKDC is the Host Local Planning Authority for the area and has been actively involved in the Application.
- 1.2.2 Collectively, the Applicant and NKDC are referred to as 'the parties.'
- 1.2.3 The matters of interest discussed with NKDC are detailed in **Section 4** of this SoCG.

1.3 Purpose of this document

- 1.3.1 This Statement of Common Ground ('SoCG') is being submitted to the Examining Authority as an agreed draft between both parties. This SoCG is a 'live' document and will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.
- 1.3.2 The SoCG has been prepared in accordance with the Department for Levelling Up, Housing and Communities' Guidance on the examination stage for Nationally Significant Infrastructure Projects ('DLUHC Guidance')¹.
- 1.3.3 Paragraph 007 of the DLUHC Guidance comments that:

"A Statement of Common Ground (SoCG) is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at the examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority".




¹ Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (30 April 2024).

- 1.3.4 The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between NKDC and the Applicant on matters relating to the Application.
- 1.3.5 The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and NKDC.
- 1.3.6 The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.
- 1.3.7 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate's website. (<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010149/documents>).
- 1.3.8 This SoCG includes responses to topics raised within NKDC's Relevant Representation submitted 13 February 2025. The issues that have been raised within the Relevant Representation by NKDC have been responded to within this SoCG, rather than duplicating the responses within the Responses to Relevant Representations report [EN010149/APP/8.13].
- 1.3.9 Once finalised, the SoCG will be submitted to the Examining Authority that is examining the Application under section 37 of the PA 2008 for an order granting development consent for the Proposed Development.
- 1.3.10 For the purposes of examination, this SoCG addresses the following key topic areas:
- Alternatives;
 - Approach to EIA;
 - Battery Storage;
 - Ecology and Biodiversity;
 - Climate;
 - Connecting to the Grid;
 - Construction;
 - Cultural Heritage;
 - Cumulative Effects;
 - Decommissioning;
 - Design;
 - Glint and Glare;
 - Landscape and Visual;
 - Land, Soil and Groundwater;
 - Noise and Vibration;
 - Operation;
 - Population;

- Public Rights of Way and permissive footpaths;
- Traffic and Transport;
- Water; and
- Draft Development Consent Order and Requirements.

1.4 Terminology

1.4.1 This SoCG summarises the main topics covered and the status of the matter. The colour coding system used within the table in **Section 4** has been outlined below.

Cell	Status
	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of on-going discussions between the parties.
	Not Agreed – indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

2. The Proposed Development

2.1 Proposed Development Description

- 2.1.1 The Proposed Development comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) array electricity generating facility with a total capacity exceeding 50 megawatts (MW), a Battery Energy Storage system (BESS) with an import and export connection to the National Grid Electricity Transmission.
- 2.1.2 The Proposed Development comprises the installation, construction and decommissioning works, with the details to be defined at detailed design and subject to approval by the Local Authority. The detailed design of the Proposed Development will be required to be undertaken within the parameters assessed in the Environmental Statement, which are secured through a range of control documents including the **Works Plans [EN010149/APP/2.3] [APP-007]**, the **Design Commitments [EN010149/APP/7.4] [APP-0138]** and the requirements set out in the **Draft Development Consent Order [EN010149/APP/3.1.2]**.
- 2.1.3 The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate. The location of the Proposed Development is shown in **Environmental Statement (ES) Volume 2, Figure 1.1: Location Plan [EN010149/APP/6.2] [APP-058]** and described in **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010149/APP/6.1] [APP-042]**, with the consideration of alternatives and the evolution of the design of the Proposed Development presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1] [APP-044]**.
- 2.1.4 The Proposed Development will be located within the 'Order Limits' (the land shown on the **Works Plans [EN010149/APP/2.3] [APP-007]** within which the Proposed Development can be constructed, operated and decommissioned). The extent of the Order Limits is shown on **ES Volume 2, Figure 1.2: Order Limits [EN010149/APP/6.2] [APP-058]**. The principal components of the Proposed Development include:
- Solar PV development including;
 - Ground-mounted Solar PV generating station. The generating station will include Solar PV modules and mounting structures;
 - Balance of Solar System (BoSS), which comprises inverters, transformers, and switchgear;
 - 400kV Grid Connection Corridor to connect the Springwell Substation and proposed National Grid Navenby Substation;
 - Satellite Collector Compounds comprising switchgear, transformers, ancillary equipment and operation, maintenance, security and welfare units;
 - A project substation (the 'Springwell Substation') compound, which will include substation, Main Collector Compound, switching and control equipment, office/control/welfare/security buildings, storage areas, and provisions for vehicular parking and material laydown;

- BESS compound, including batteries and associated inverters, transformers, switchgear and ancillary equipment and their containers, enclosures, monitoring systems, air conditioning, electrical cables, fire safety infrastructure and operation, maintenance, security and welfare facilities;
- Underground cabling will connect the Solar PV modules and BESS compound to the BoSS, Collector Compounds, and the Springwell Substation;
- Ancillary infrastructure works, including boundary treatments, security equipment, earthing devices, fencing, lighting, earthworks, surface water management, internal tracks and any other works identified as necessary to enable the Proposed Development;
- Landscaping, habitat management, biodiversity enhancement and amenity improvements; and
- Works to facilitate vehicular access to the Order Limits.

3. Record of Engagement

3.1. Summary of engagement

- 3.1.1. The Applicant has engaged with NKDC throughout the Development Consent Order application process, including during the early stages of the design and environmental assessment of the Proposed Development. Table 1 shows a summary of key engagement that has taken place between the Applicant and NKDC in relation to the Application.
- 3.1.2. The Applicant built long-term working relationships with NKDC officers. This included holding regular meetings focused on planning and communications, scheduled fortnightly, from the close of Phase One Consultation on 7 March 2023 to the submission of the Application, as referred to in Appendix B2 - Stakeholder Engagement Undertaken outside of Formal Consultation. These fortnightly meetings continued through the pre-examination phase and into the examination period.
- 3.1.3. The primary purpose of the Planning and Communications meetings was to provide regular updates on the progress of the Proposed Development (including consultation and engagement activities), collect feedback on the evolving plans and highlight any concerns to ensure these could be addressed proactively through the design and assessment process.

Table 1 – Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
11 October 2022	Email	<ul style="list-style-type: none">Written Scheme of Investigation for geophysical survey sent for comment to the heritage team.
15 March 2023	Planning and Communications Meeting	<ul style="list-style-type: none">Ward councillor engagementUpdate on planned resident design workshops
27 April 2023	Planning and Communications Meeting	<ul style="list-style-type: none">Feedback on residential design workshops
11 May 2023	Planning and Communications Meeting	<ul style="list-style-type: none">Confirmation of timing of informal consultation period on draft SoCC.
18 May 2023	Email correspondence with the Environmental Health Officer	<ul style="list-style-type: none">Correspondence regarding the scope of the baseline noise monitoring, proposed monitoring locations and length of the survey, as well as proposed scope of the noise and vibration assessment.North Kesteven District Council agreed on the survey monitoring approach and requested to ensure that the proposed baseline monitoring locations are considered in the context of potentially noisy ancillary equipment.North Kesteven District Council agreed on the assessment approach but requested that the operational noise require rating noise levels to be a maximum of five decibels above measured background levels, and requested for a Construction

Date	Form of correspondence	Key topics discussed and key outcomes
		Environmental Management Plan.
01 June 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Discussion on contents of the draft SoCC. Topics discussed included the boundary of the inner zone, locations of the deposit points, the location and timings of public events, seldom heard groups and date of formal SoCC consultation
01 June 2023	Landscape and Design Meeting	<ul style="list-style-type: none"> Introduced the approach to good design and the use of design principles Initial meeting via AAH Consultants regarding viewpoints and photomontage locations for LVIA to be agreed with North Kesteven District Council and Lincolnshire County Council.
13 June 2023	Site Meeting with AAH Consultants	<ul style="list-style-type: none"> Discussion of viewpoints and photomontage locations for LVIA.
29 June 2023	AAH technical memorandum 2 (AAH TM02)	<ul style="list-style-type: none"> Comments on viewpoints and photomontage locations for LVIA.
03 July 2024	Landscape Meeting with AAH Consultants	<ul style="list-style-type: none"> Discussion of viewpoints and photomontage locations for LVIA.
07 July 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Discussion on key changes made to the draft SoCC ahead of formal consultation (15 September – 13 October 2023) to take into account feedback from host authorities. Key changes included: <ul style="list-style-type: none"> Revising the boundary of the inner zone to follow a 2- kilometer buffer around the proposed Site boundary, extending in some areas to consider the wider effects of the Proposed Development. Changing the location of a deposit point from Waddington Bar Library to The Venue, Navenby because it was less distant from the proposed Site. Adding an additional public event at The Venue, Navenby.
31 July 2023	Email	<ul style="list-style-type: none"> Consultation on air quality assessment approach. The suggested assessment approach was accepted by North Kesteven District Council on behalf of Lincolnshire County Council.
15 August 2023	AAH technical Memorandum 3 (AAH TM03)	<ul style="list-style-type: none"> Confirmation that the LVIA viewpoints proposed for the PEIR were acceptable. Requested that all viewpoint photography should be taken in accordance with LI TGN 06/19: Visual Representation of Development Proposals. Requested that a methodology for the visualisations to be provided.

Date	Form of correspondence	Key topics discussed and key outcomes
		<ul style="list-style-type: none"> Discussion about the study area for LVIA and AAH TMO3 confirmed that the study areas proposed were appropriate subject to justification being presented in the LVIA and confirmation of there being no significant effects beyond these distances. Landscape Character Areas described in the North Kesteven Landscape Character Assessment were discussed in early meetings and AAH TMO3 confirmed that LCA 6 (Lincoln Cliff) and LCA 13 (Fenland) could be scoped out subject to inclusion of a brief statement in the LVIA that recognises their proximity to the Order Limits and justification for their exclusion being presented in the LVIA.
14 September 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Update on design approach and design principles (copy of design principles issued post-meeting) Discussion on matters arising from formal consultation on the draft SoCC. Key changes following formal consultation included: <ul style="list-style-type: none"> Moving four public events forward to week 2 of the consultation to give consultees more time to engage before the end of the consultation period. Update on timings for phase two consultation. Discussion on ecology surveys undertaken and biodiversity design. North Kesteven District Council Ecologist agreed with the revised assessment of receptors to be scoped in and those to be scoped out on the proviso that wintering bird surveys and notable arable flora surveys should be carried out. The number of wintering bird survey visits could be curtailed if findings justify.
15 September 2023	Email and virtual meeting	<ul style="list-style-type: none"> The proposed evaluation strategy along with the Archaeological Desk-Based Assessment and Stage 1 Setting Assessment, Aerial Investigation and Mapping report and Geophysical Survey results were sent to the heritage team. Maintained request for trial trenching across entire Site without targeting for greatest potential ground impact.
19 October 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Launch of phase two consultation
02 November 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Update on progress of phase two consultation
16 November 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Ward councillor engagement Update on planned resident design workshops

Date	Form of correspondence	Key topics discussed and key outcomes
16 January 2024	Email	<ul style="list-style-type: none"> Summarised noise survey results and refined proposed assessment criteria adopting fixed limits, which was agreed with North Kesteven District Council Environmental Health Team.
08 February 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> Feedback on residential design workshops
08 February 2024	Landscape and Design Meeting	<ul style="list-style-type: none"> Update on LVIA and design principles.
19 February 2024	AAH technical Memorandum 4 (AAH TM03)	<ul style="list-style-type: none"> Discussions about the proposed National Grid Navenby Substation. Request for a cumulative assessment to be undertaken with the National Grid Substation. In the PEIR published at statutory consultation, a series of different options were put forward for various elements of the Proposed Development. It was requested that the ES clearly set out the parameters of the development, such as heights and locations of elements that have been used in the assessment, and the assessment be based on a 'worst-case' scenario. Potential impacts on landscape character in the vicinity of and views from the A15. Sought clarification on the extent of overhead lines. Request for height of fencing and CCTV to be reviewed. Request that details of vegetation removal be provided in the Environmental Statement. Request for planning policy discussed in the LVIA be updated to take account of any recent amendments to policy/guidance. Request for the Applicant to justify the buffers applied and raised initial concern about new landscaping 15m either side of PROWs. Request for greater level of detail covered regarding Landscape Character Areas compared to the North Kesteven Landscape Character Assessment (LCA). Requested that the LVIA not report effects on landscape character with reference to the LCA 'as a whole' but rather consider effects on the part of the LCA in which the proposed Development is located. Request for reference to be made to <i>The Historic Character of the County of Lincolnshire</i>. Request for the A15 to be reclassified and that receptors are described as more susceptible to changes in the view. Confirmation of the methodology and assessment criteria and requested that where 'moderate' effects are considered to be 'not significant' a brief justification to be provided.
29 February 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> Key headlines from phase two consultation

Date	Form of correspondence	Key topics discussed and key outcomes
18 March 2024	Virtual meeting with Conservation Officer	<ul style="list-style-type: none"> Discussion about initial baseline setting assessment and response to the Scoping Report and Preliminary Environmental Information Report. More detailed setting assessment to be provided to justify scoping out of assets.
03 April 2024	Email	<ul style="list-style-type: none"> Sought advice on the air quality assessment year of early decommissioning, following receipt of statutory consultation comments from North Kesteven District Council. North Kesteven District Council on behalf of Lincolnshire County Council confirmed the assessment year of early decommissioning at year 20.
04 April 2024	Landscape and Design Meeting	<ul style="list-style-type: none"> Discussion regarding Landscape Visual Impact Assessment content of the Environmental Statement. Discussion about matters from AAH technical Memorandum 4 (AAH) dated 19 February 2024 and highlighted above.
09 May 2024	Meeting	<ul style="list-style-type: none"> Statutory consultation response discussion. North Kesteven District Council did not agree that hedgerows and hedgerow trees can be scoped out of the assessment and considered that habitat losses should be quantified within the Environmental Statement (ES) even if the habitat is scoped out of the assessment. The impact assessment can be proportionate to the relevant impacts and effects. North Kesteven District Council agreed with the rationale given for the scoping out of the named Local Wildlife Site. North Kesteven District Council did not agree that wintering birds can be scoped out of the operational impact assessment. North Kesteven District Council did not agree that badgers can be scoped out of the assessment as detailed information on the location of the setts has not been provided. North Kesteven District Council was of the opinion that scarce arable flora is a relevant receptor that needs to be addressed through appropriately timed specialist plant surveys. North Kesteven District Council queried the statement that no veteran trees had been identified. North Kesteven District Council noted that the habitat information within ES Volume 3, Appendix 7.1: Preliminary Ecological Appraisal is not sufficient to evidence a BNG assessment.
31 May 2024	Meeting	<ul style="list-style-type: none"> Discussion about agricultural land classification survey outputs with North Kesteven District Council and RSK landscape specialist, who are acting on behalf of North Kesteven District Council and Lincolnshire County Council as their soils specialist.

Date	Form of correspondence	Key topics discussed and key outcomes
		<ul style="list-style-type: none"> • Discussion of the summary of the soil types across the Site and survey results, alongside approach to the design development and consideration towards Best Most Versatile land. • Discussion about feedback from PEIR, with particular reference to the production of a figure to show the agricultural land classification grades overlaid with the Zonal Masterplan and approach to land taken out of agricultural use.
June 2024	Email	<ul style="list-style-type: none"> • Discussion about the need to undertake a Mineral Safeguarding Assessment as part of the pre-application engagement that will form part of an appendix to the Planning Statement.
19 June 2024	Landscape Meeting	<ul style="list-style-type: none"> • Discussion regarding Landscape Visual Impact Assessment content of the Environmental Statement and to discuss final viewpoint selection for the LVIA.
26 June 2024	Email	<ul style="list-style-type: none"> • Sought agreement on the changes on the scope of the air quality construction phase dust risk assessment. Changes were accepted by North Kesteven Council on behalf of Lincolnshire County Council.
27 June 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> • Approach to targeted consultation
05 July 2024	Meeting with North Kesteven District Council Climate Change Manager	<ul style="list-style-type: none"> • Agreement on the proposed methodology for the incorporation of the National Grid Navenby Substation into the climate Assessment
10 July 2024	AAH technical Memorandum 5 (AAH TM05)	<ul style="list-style-type: none"> • Confirmation that the final viewpoint selection for the LVIA was acceptable and agreed.
11 July 2024	Email from AAH Consultants	<ul style="list-style-type: none"> • Confirmation that the photomontage locations for the LVIA were agreed.
11 July 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> • Update on proposals for targeted consultation
23 July 2024	Meeting	<ul style="list-style-type: none"> • Discussed the findings of ecological surveys and further scheduled surveys to be carried out in Summer 2024. • Suggestions about notable arable flora surveys were made to consider survey of maize fields as they are late sown crop and arable plants can emerge after summer rain. • Discussed design updates with regards to proposals for removal of sections of Local Wildlife Site (LWS) calcareous grassland road verges. North Kesteven District Council considered that the LWS road verges were not of high quality, therefore had considers that seeding and improved long term management could improve the quality.

Date	Form of correspondence	Key topics discussed and key outcomes
		<ul style="list-style-type: none"> Discussions about Biodiversity design. North Kesteven District Council noted a potential risk to barn owls and deers crossing the A15 due to habitat enhancement proposals.
25 July 2024	Virtual Meeting	<ul style="list-style-type: none"> Discussion about the Flood Risk Sequential Approach undertaken throughout the design development.
22 August 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> Key headlines from targeted consultation Discussion on AoCM
12 September 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> Update on design approach including the use of design principles, response to feedback and the mechanisms by which good design will be secured via control documents in the draft DCO (including discussion of Design Commitments).
18 September 2024	Email	<ul style="list-style-type: none"> Proposed to scope out vibration assessment during construction and decommissioning as works are considered to be far enough away, which was agreed with NKDC Environmental Health Team.
October 2024	Emails	<ul style="list-style-type: none"> Sharing and discussing the short and long list criteria and the cumulative assessment
5 March 2025	Archaeological and trail trenching Meeting	<ul style="list-style-type: none"> Project update on dates and status Results of trenching and scope of outline WSI for post-DCO additional trenching and mitigation
2 April 2025	Built Heritage Meeting	<ul style="list-style-type: none"> Discuss around Built Heritage Assessment and the scope of works Levels of harm to listed buildings and conservation areas
3 April 2025	Socio-economic, Employment, Skills and Supply Chain Meeting	<ul style="list-style-type: none"> Discuss around the outline Employment, Skills and Supply Chain Plan, including objectives and themes Further Stakeholder Engagement
16 April 2025	Ecology and Biodiversity Meeting	<ul style="list-style-type: none"> Discuss around the BNG calculation and watercourses units Discuss around the potential need for an Ecology Steering Group, the BNG monitoring fee and the biodiversity enhancement fund
17 April 2025	Archaeological and trail trenching Meeting	<ul style="list-style-type: none"> Discuss the approach to archaeology and associated relevant representation comments.
30 April 2025	Built Heritage Meeting	<ul style="list-style-type: none"> Discussed the assessment of designated heritage assets, including Conservation Areas, Scopwick Mill and Thompsons Bottom Farmhouse and had further discussion on the development of the design and consideration that has been afforded towards built heritage assets.

4. Current Position

4.1 Position of the Applicant and NKDC.

- 4.1.1. The following tables set out the position of the Applicant and NKDC, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.
- 4.1.2. As noted above, this is a 'live' document, and some aspects have yet to be agreed upon between both parties. The intention is to provide a final position in subsequent versions of the SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points.

Table 2 – Planning Policy

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2-1	S42 Consultation response to 2024 Consultation	National policy	NKDC note that the National Planning Policy Framework (NPPF) is relevant national policy and the Applicant should reference the last version in preparing the Application.	<p>The Applicant has considered the most recent policies of the NPPF in the preparation of the Application.</p> <p>Appendix 3: Policy Compliance Assessment Table of the Planning Statement [EN010149/APP/7.2.2] [AS-018] provides detailed evidence of compliance with relevant national and local policy documents. Table 4 provides an assessment of both the current and consulted NPPF.</p>	Agreed
2-2	S42 Consultation response to 2024 Consultation	National policy	Applicant should include a discussion of para. 181/footnote 62 of the National Planning Policy Framework (NPPF) with reference to the use of land for food production.	<p>The Applicant can confirm that all relevant aspects of the NPPF have been considered and assessed within Appendix 3: Policy Compliance Assessment Table of the Planning Statement [EN010149/APP/7.2.2] [AS-018]. However, footnote 62 has now been removed from the NPPF and therefore is not of relevance.</p>	Agreed

Table 3 – Air Quality

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
3-1	S42 Consultation response to 2024 Consultation	Embedded mitigation measures	NKDC comments that the Applicant should justify the embedded mitigation measures for air quality.	Embedded mitigation measures for air quality have been detailed in ES Volume 1, Chapter 6: Air Quality [EN010149/APP/6.1] [APP-046] , where the function for each embedded measure is explained, together with the securing mechanism. The embedded mitigation measures relevant to air quality are built development will be offset at least 20m from Local Wildlife Sites (LWSs) except for highways improvement works, perimeter fencing surrounding the Solar PV development will be offset at least 15m from existing woodlands, Springwell Substation, Battery Energy Storage System (BESS), Collector Compounds, Standalone Inverter, Transformer and Switchgear and Inverter and Transformer Stations (ITS) will be offset at least 250m from residential properties. These embedded mitigation measures have been established based on the Institute of Air Quality Management (IAQM) Guidance of the Assessment of Dust from Demolition and Construction v2.2 (2024) to minimise the dust and exhaust emission impacts from the Proposed Development.	Agreed

Table 4 – Alternatives

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
4-1	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Alternatives – site selection	<p>NKDC comments about how the location of the grid connection has been considered in the site selection process, including:</p> <ul style="list-style-type: none"> • That only sites around the grid connection point have been considered, and others should be considered e.g., offshore locations, rest of the country. • That the area immediately around the collection point (along the A15) should be used rather than being distributed over a larger area. <p>That alternatives within a minimum 10km distance either side of the Cottam Socon network should be considered, rather than site selection being based on the need to minimise the length of the cable connection.</p> <p>Awaiting ExQ1 response / comments.</p>	<p>At the outset the Applicant's aim was to deliver a NSIP scale solar farm to meet the critical national need for low carbon and renewable energy generation. Site selection has been driven primarily by:</p> <ul style="list-style-type: none"> - The availability of a suitable grid connection - Suitable topography and irradiance - The availability of land <p>ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1] [APP-044] sets out the Applicant's approach to alternatives, including locations and technologies. The chapter concludes that there were no reasonable alternatives that could deliver the Applicant's objectives within the same timeframe, which is in accordance with the intent of NPS EN-1 para. 4.3.22.</p> <p>The Applicant considers it reasonable for the site selection process to focus on land in close proximity to a potential connection point as this represents one of the three core attributes required to deliver a NSIP scale solar farm (as set out in the Site Selection Report at Appendix 1 of the Planning Statement [EN010149/APP/7.2.2] [AS-018]). Without a point of connection, the electricity generated would effectively have nowhere to go.</p> <p>This approach is supported in NPS EN-3 and helps reduce energy loss, potential environmental impacts compared to</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>shorter cable routes, and deliverability based on the potential additional number of land interests.</p> <p>The Site is based on land available to the Applicant. While the landowner may have wider interests and holdings, that does not translate into availability for solar development. The layout of the Proposed Development has been environmentally led and proposes a mixture of solar PV development, wider infrastructure, and mitigation that responds to the context of the Site and is laid out in a coherent fashion. The Applicant's Site Selection Report is included in Appendix 1 of the Planning Statement [EN010149/APP/7.2.2] [AS-018].</p>	Under Discussion
4-2	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Alternative sites analysis	<p>NKDC comments that the following should not form the basis of the alternative sites analysis:</p> <ul style="list-style-type: none"> • Ruling out sites below a notional capacity threshold • Specific landholding arrangements e.g., a single landowner • The abundance of BMV land in Lincolnshire 	<p>Consecutive governments have made it clear that the delivery of low carbon and renewable energy is a priority. Indeed, NPS EN-1 defines renewable energy generation as Critical National Priority. There is nothing within the suite of energy NPSs that suggests there should be a restriction on the capacity of solar developments therefore the Applicant considers it appropriate to seek to maximise the grid connection offer.</p> <p>The Proposed Development equates to an output of 1MW per 2.4 acres, representing an efficient use of the land for solar PV and associated infrastructure within the range identified in paragraph 2.10.17 of NPS EN-3.</p> <p>One of the objectives at the outset of the project was to identify a low number of or ideally a single, landowner(s) to deliver the Proposed Development. This provides the Applicant with a greater degree of flexibility and certainty in delivery. Multiple</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			Awaiting ExQ1 response / comments.	<p>landowners generally increase complexity with the potential need to rely on the use of Compulsory Acquisition powers and increase the risk of a project not being delivered within the same timescales. Therefore, the Applicant considers its approach to be well reasoned and compliant with the NPS.</p> <p>BMV in Lincolnshire is significantly higher (71.2%) than the national average (42%). However, BMV, while important, is one of several factors that play a part in site selection. NPS EN-3 sets out a preference for the use of non-agricultural and then lower grade agricultural land, but equally is clear that land type should not be a predominating factor in determining the suitability of a site. NPS EN-3 further advises that the development of ground mounted solar arrays is not prohibited on BMV.</p> <p>The Applicant considers its approach to BMV at a site selection and site design level is appropriate and responds to the wider context of land quality locally.</p> <p>The Applicant's Site Selection Report is included within Appendix 1 of the Planning Statement [EN010149/APP/7.2.2] [AS-018].</p>	Under discussion
4-3	S42 Consultation response to 2024 Consultation	Grid connection	NKDC notes that the site selection analysis should demonstrate how the Applicant ruled out other points of connection, resulting in the need	<p>The Applicant started engagement with the National Grid Electricity System Operator (NGESO) in November 2020 to discuss potential opportunities for a new connection offer within the target region identified above.</p> <p>Existing grid connection points / National Grid substations with spare capacity, are finite. No grid connection offer was</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		and Subsequent Correspondence	<p>for a new substation. This includes:</p> <ul style="list-style-type: none"> All existing substations and 400kv across Lincolnshire and East Midlands Existing 33kv network through planning permission (14/0937/FUL), even if for a partial export. <p>Awaiting ExQ1 response / comments.</p>	<p>available to the Applicant at existing substations due to capacity restrictions in the target East Midlands region.</p> <p>The Applicant initially looked at opportunities to deliver a project of similar scale as the Proposed Development at substations where capacity existed, however, no such capacity was available with a connection date prior to 2033. As Section 7 of the Statement of Need [EN010149/APP/7.1] [APP-0135] sets out, the lack of viable alternative connections extends to a 50km radius from the Order Limits.</p>	Under discussion
4-4	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Grid connection	<p>NKDC expresses concern about the ability to evidence a grid connection within the anticipated operational timeframe of the Proposed Development.</p> <p>NKDC suggest that the proposed National Grid Navenby Substation should not be decoupled from the Proposed Development and that it constitutes related infrastructure under EN-1, or it should be demonstrated that both proposals can be progressed in</p>	<p>NPS EN-1 acknowledges that it may not be possible to coordinate different elements of a project, and that different applications may be submitted for each element of a project (see paragraphs 4.11.5 – 4.11.9).</p> <p>The Applicant has included information in relation to the proposed National Grid Navenby Substation in its Application, in particular within ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2], and the Grid Connection Statement [EN010149/APP/7.6.2].</p> <p>In ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2], the Applicant has undertaken a cumulative effects assessment, including a specific section which addresses the cumulative effect of the Proposed Development with the proposed National Grid Navenby</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>an integrated way/ include the other within its environmental assessments.</p> <p>If this is not possible, the DCO should include a legal mechanism to prohibit development until grid connection agreements are in place/ delivery timeframes are aligned.</p> <p>See ExQ1 response / comments regards NKDC request for phasing Requirement to align construction of solar farm with delivery of National Grid Navenby Substation (NGNS). NKDC await applicant's response to ExQ1 question re grid connection.</p>	<p>Substation, and has complied with the EIA Regulations requirements in this respect. The proposed National Grid Navenby Substation is not required solely in connection with the Proposed Development (with multiple connections agreed on the TEC register), and National Grid's preference has been to obtain planning permission for its own substation. These are the reasons why the Application for the Proposed Development does not seek consent for the National Grid Navenby Substation. As recorded in the Grid Connection Statement [EN010149/APP/7.6.2], the Applicant has a grid connection offer at the proposed Navenby Substation, and the Applicant is aware that National Grid intends to seek planning permission for the substation by way of a Town and Country Planning Act (1990) Application to NKDC.</p> <p>The Applicant is not aware of any obvious reason why the proposed Navenby Substation would not receive planning permission. In terms of the suggestion that the commencement of the Proposed Development should be in some way be restricted based on milestones achieved for the Navenby Substation, there is no justification for this approach. Firstly, the Applicant already has its grid connection offer and NGET are therefore required to provide the connection. Further, the Applicant considers that such a requirement could prevent the Proposed Development from being carried out in a timely and efficient manner, which is not appropriate having regard to the urgent need to deliver renewable energy and CNP which the Project is considered.</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>Finally, the Applicant's decision to commence construction of the Proposed Development would also be driven by commercial considerations, and it is highly unlikely that the Applicant would construct the Proposed Development without sufficient confidence that a grid connection would be in place for the export of the energy generated.</p> <p>The Applicant has therefore satisfied the requirements of NPS EN-1 and there is no justification for a restriction of the type suggested.</p>	

Table 5 – Approach to EIA

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
5-1	S42 Consultation response to 2024 Consultation	Approach to EIA	NKDC comments that the final ES should clearly set out the parameters of the Proposed Development, and where these cannot be reasonably fixed, assessment should be based on a worst-case scenario.	The parameters that have been assessed within the ES and would be secured as part of the Proposed Development are detailed within ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2] and ES Volume 3, Appendix 3.1: Project Parameters [EN010149/APP/6.3] [APP-074] . If there is optionality retained in the design, a worst-case scenario has been assessed for each environmental factor.	Agreed
5-2	S42 Consultation response to 2024 Consultation	Embedded mitigation measures	NKDC notes that the Applicant should justify the choice of buffer zone distances applied and whether these are a product of the technical assessments carried out, best practice, or both.	<p>The Applicant has incorporated minimum offsets to specific elements of the Proposed Development based on a combination of guidance, good practice, precedence set by other NSIP solar schemes and professional judgement from technical specialists of the project team.</p> <p>For example, there would be a minimum 15m offset from proposed built development to any existing woodland in accordance with guidance published by Natural England and the British Standards Institution for tree root protection areas.</p> <p>The study area for each environmental factor alongside the reasoning of why buffer distances have been applied and used for the assessment is included within Section 4 in each topic chapter of the ES Volume 1, Chapters 6-15 [EN010149/APP/6.1] [APP-046] to APP-055].</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
5-3	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Embedded mitigation measures	<p>NKDC notes that the embedded mitigation measures in relation to agricultural land impacts cannot be accepted as national policy requires justification for, and avoidance of the use of any BMV land.</p> <p>Awaiting ExQ1 response / comments.</p>	<p>NPS EN-3 sets out a preference for the use of non-agricultural land in the first instance and subsequently lower grades of agricultural land, should this be required. However, NPS EN-3 asserts that land type should not be a predominating factor in determining the suitability of a site location and that the development of ground mounted solar arrays is not prohibited on Best and Most Versatile (BMV) land. NPS EN-3 further recognises that, at scale, it is likely that developments would use some agricultural land subject to the Applicant explaining their choice of site.</p> <p>As set out in the Appendix 1: Site Selection Report to the Planning Statement [EN010149/APP/7.2.2] [AS-018] there is no brownfield land within the administrative area of North Kesteven District Council that has the capability of delivering the project objectives. It should also be noted that within Lincolnshire there is a significantly higher proportion of BMV (71.2%) in comparison to the national average (42%). While this does not simply give justification to propose solar development on BMV land, it sets the context that non-BMV land is less abundant.</p> <p>It is also important to recognise that land type is one of many factors that influence site selection and needs to be considered in a proportionate way. Nevertheless, the Applicant sought to avoid higher grades of agricultural land (see Appendix 1: Site Selection Report to the Planning Statement [EN010149/APP/7.2.2] [AS-018] and the Design Approach Document [EN010149/APP/7.3.2]) and took appropriate</p>	Under discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				mitigation measures to limit use of most productive land during the lifetime of the Proposed Development. The Applicant considers its approach to be reasoned and in accordance with the requirements of policy set out in NPSs EN-1 and EN-3.	
5-4	S42 Consultation response to 2024 Consultation	Lifespan	<p>NKDC notes that assessments of the Proposed Development have assumed an operational lifespan of 40 years however the following considerations should be factored in:</p> <ul style="list-style-type: none"> Cumulative assessments should consider the likely permanence of the NGNS Presumption of repowering under NPSs/NPPF 	<p>It is noted that the proposed National Grid Navenby Substation does not form part of the Application. However, in line with the EIA Regulations and case law, an assessment of the cumulative effects of the proposed National Grid Navenby Substation is detailed within ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].</p> <p>The Draft DCO [EN010149/APP/3.1.2] includes Requirement 19 which states that each phase of the Proposed Development must be decommissioned after 40 years of operation and the Planning Act 2008 makes it an offence to not comply with the obligations in a Development Consent Order. Therefore, under the provisions of this Draft DCO the Proposed Development will be decommissioned in accordance with Requirement 19.</p> <p>In terms of the likely permanence of the National Grid Navenby Substation, as the Proposed Development will be decommissioned after 40 years of operation, this is not relevant to the assessment.</p> <p>In terms of repowering, the Applicant has set out in ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2] the assumptions for the Proposed</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				Development in relation to ongoing maintenance and replacement of parts during the lifetime of the Proposed Development. These have been fully assessed in the ES. The Applicant is only authorised to “maintain” the Proposed Development under the DCO until it is required to decommission it and that power does not authorise works which are likely to give rise to any materially new or different effects to those assessed in the Environmental Statement. There are therefore controls in place with respect to actions during operation, and this has no impact on the 40-year operational lifetime of each phase of the Proposed Development.	
5-5	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	National Grid Navenby Substation	<p>NKDC recommend that all relevant chapters must assess cumulative construction and operational effects of the proposed National Grid Navenby Substation as it is indivisible from the Proposed Development.</p> <p>NKDC awaiting further information on fallback if NGNS is not approved which may have cumulative impact implications.</p>	<p>It is noted that the proposed National Grid Navenby Substation does not form part of the Application. However, in line with the EIA Regulations and case law, an assessment of the cumulative effects of the proposed National Grid Navenby Substation is detailed within ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].</p> <p>NPS EN-1 acknowledges that it may not be possible to coordinate different elements of a projects that interface, and that different applications may be submitted for each element of a project (see paragraphs 4.11.5 – 4.11.9). NPS EN-1 sets out the requirements of the Applicant in the circumstance where elements are consented separately.</p>	Under Discussion

Table 6- Battery Storage

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
6-1	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Guidance	<p>NKDC notes that the Applicant should continue to engage with Lincolnshire Fire and Rescue, which has provided planning guidance for Grid Scale BESS.</p> <p>Other comments requested the Applicant to engage on points regarding required configuration of fire safety equipment, water storage tanks and shut off valve/s etc.</p> <p>NKDC's Local Impact Report (LIR) and Written Representation (WR) will make further points on the BESS.</p>	<p>The Applicant has applied industry best practice to the design of the BESS, including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems".</p> <p>The Applicant has engaged with Lincolnshire FRS throughout the process, with ongoing dialogue on suitable preventative measures and response to any thermal runaway event. Comments received from the Lincolnshire FRS have been incorporated into the design of the BESS compound, Outline Battery Safety Management Plan (oBSMP) [EN010149/APP/7.14.2] and the BESS Plume Assessment [EN010149/APP/7.19.2]. Part of the mitigations discussed and agreed with Lincolnshire FRS relate to the potential need for water to cool adjacent enclosures in the event of a fire. If required, the BESS compound can accommodate sufficient water storage over and above the minimum currently required under NFCC guidance. Appropriate measures would be agreed with the Lincolnshire FRS during detailed design.</p>	Under discussion
6-2	S42 Consultation response to 2024 Consultation	Location of BESS	NKDC suggest that the BESS, main collector compound and Springwell Substation are focussed in Springwell East due to lesser landscape sensitivity. Other	The Applicant's rationale behind the location of the BESS is due to it being as close to the project substation as reasonably possible. If the project substation was in Springwell East, cables would run from the west to the east and then back again	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
	and Subsequent Correspondence		<p>comments request justification for why the BESS cannot be provided on a smaller scale which could open up alternatives in Springwell East.</p> <p>NKDC continue to raise concerns re landscape and visual impact of BESS in Springwell East.</p>	resulting in a huge increase in the EIA impacts as well as efficiency impacts.	Under Discussion
6-3	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Scale	<p>NKDC state that the proposed BESS is too large. Other comments requested more justification for the size of the BESS.</p> <p>NKDC continue to raise concerns re landscape and visual impact of BESS in Springwell East.</p>	<p>Paragraph 2.10.10 within NPS EN-3 sets out that government is supportive of solar development that is “<i>co-located with other functions (including storage) to maximise the efficiency of land use</i>”.</p> <p>The starting point for the size of the BESS is to make the best use of the National Grid connection agreement. There is an urgent need to decarbonise the grid, and the BESS plays an important role balancing the grid. In any event, the size of the BESS is limited due to environmental considerations e.g. from environmental impact assessments like noise, and it is Associated Development to the principal development. The BESS facility has been sized to reflect the scale of the solar installation, as well as reflect the requirements for safe operation of the site, such as those in the NFCC Guidance.</p>	

Table 7 – Ecology and Biodiversity

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
7-1	S42 Consultation response to 2024 Consultation	Approach to assessment	NKDC note that where habitats are relevant to the BNG baseline, the Applicant is responsible for demonstrating which habitats are priority habitats with reference to current definitions and suitable baseline data. MAGIC shouldn't be relied on a definitive reference.	<p>All habitats within the Order Limits have been field surveyed using UK habitat survey methodology and assessed in accordance with Biodiversity Net Gain methodology and for priority habitat status with reference to current definitions and suitable baseline data. Survey details are shown in ES Volume 3, Appendix 7.1: Preliminary Ecological Appraisal [EN010149/APP/6.3.1].</p> <p>Habitat is also quantified in the ES Volume 3, Appendix 7.14: Biodiversity Net Gain [EN010149/APP/6.3.1] and within the Outline Landscape and Ecology Management Plan [EN010149/APP/7.9.2].</p>	Under discussion
7-2	S42 Consultation response to 2024 Consultation	Approach to assessment	NKDC note that further hedgerow surveys should meet relevant guidance for assessment and evidence how the Proposed Development has been designed to avoid impacts to high-value hedgerows. Other comments highlight a cross-discipline approach is needed to identify hedgerows of importance on wildlife, landscape and heritage grounds.	<p>As well as the UK habitat survey and condition assessment of hedgerows, surveys of hedgerows were also carried out to assess their 'importance' under the wildlife and landscape criteria of the Hedgerows Regulations 1997, with survey data then used to inform the design of the Proposed Development.</p> <p>A desk study was also carried out to determine the historical importance of hedgerows as detailed in ES Volume 3, Appendix 9.1: Archaeological Desk Based Assessment [EN010149/APP/6.3.2] [AS-014]. Hedgerows and trees which had bat roost potential have been avoided in the design of the Proposed Development, which is shown in ES Volume 2 Figure 7.2: Bat Ground Level Tree Assessment and Areas Proposed for Vegetation Removal [EN010149/APP/6.2] [APP-064]. The Applicant has sought to avoid hedgerows assessed as important where possible. However, ten important hedgerows</p>	Under discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				(for wildlife and landscape reasons) and two historically important hedgerows (which represent pre-enclosure systems) would be affected by vegetation removal proposals for cable installation and/or access. A plan showing important hedgerows which would be affected by works is included in: ES Volume 3, Appendix 7.11: Important Hedgerow Survey [EN010149/APP/6.3] [APP-092] . The historical assessment is provided in ES Volume 3, Appendix 9.1: Archaeological Desk Based Assessment [EN010149/APP/6.3.2] [AS-014] .	
7-3	S42 Consultation response to 2024 Consultation	Bats	NKDC note that the site baseline is of regional to national importance for bats and agreement with approach within the Bat Activity Survey Report and proposals for further surveys and assessments.	This has been noted regarding agreement with the Applicant's approach to assessment as set out in the Bat Activity Survey report. Further details on the bat activity surveys can be found within ES Volume 3, Appendix 7.5: Bat Activity Survey [EN010149/APP/6.3.2] , Appendix 7.6: Bat Activity Survey Addendum [EN010149/APP/6.3] [APP-087] and Appendix 7.13: Further Targeted Bat Activity Survey [EN010149/APP/6.3] [APP-094] .	Agreed
7-4	S42 Consultation response to 2024 Consultation	Bats	NKDC note that further consideration of operational lighting design to limit effects on bats will be required.	Lighting has been considered to minimise light spill to prevent disturbance to bats and other nocturnal animals. Throughout construction and operation, the use of motion detection or manually operated lighting would be used to avoid constant lighting. Security lighting would use infra-red which is not on the visible spectrum for bats. The lighting design is secured in the Design Commitments [EN010149/APP/7.4] [APP-0138] and discussed in the ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1.2] .	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
7-5	S42 Consultation response to 2024 Consultation	Biodiversity net gain	<p>NKDC note that the Proposed Development is expected to deliver a significant BNG, and a Biodiversity Gain Plan, oLEMP and Habitat Management and Monitoring Plan is required to demonstrate how this would be secured.</p> <p>NKDC note that that the Applicant has not indicated that it will conduct further habitat surveys in support of BNG assessment which is considered necessary.</p>	<p>The oLEMP [EN010149/APP/7.9.2] has outlined the habitat management and monitoring required to deliver a net gain in biodiversity.</p> <p>All habitats within the Order Limits have been field surveyed using UK habitat survey methodology and assessed in accordance with Biodiversity Net Gain methodology and for priority habitat status with reference to current definitions and suitable baseline data. Survey details are shown in ES Volume 3, Appendix 7.1: Preliminary Ecological Appraisal [EN010149/APP/6.3.2]. In addition, Morph Surveys (River Condition Assessment) has been completed indicating enhancement in the riparian zone, as outlined in Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3.2] and the oLEMP [EN010149/APP/7.9.2] will deliver a 13% gain in watercourse units. Therefore, no addition surveys are required to inform the BNG assessment.</p> <p>As demonstrated out in ES Volume 2, Figure 3.3: Green Infrastructure Parameters [EN010149/APP/6.2.2] which is secured as Appendix 1 of the oLEMP [EN010149/APP/7.9.2] the approximately 15km of new hedgerow planting proposed has not identified which proportion of the new planting will have either a ditch or bank associated with it – this is the reason why the trading rules are not currently met as the new hedgerow planting has not indicated this which gives the extra distinctiveness required. The final BNG and LEMP will ensure an appropriate proportion of the new hedges have either a back or</p>	Under discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>ditch associated with them to ensure the trading rules are satisfied.</p> <p>For the baseline, the total length of hedgerows within the Order Limits of high distinctiveness is c. 1.66km. To satisfy the trading rules, the final green infrastructure will need to deliver:</p> <ul style="list-style-type: none"> a. Create 0.03km (30m) of native hedgerow with trees - associated with a bank or ditch (moderate condition). b. Enhance 0.02km (20m) of existing native hedgerows with trees - associated with a bank or ditch from moderate to good condition. <p>The oLEMP [EN010149/APP/7.9.2] and the final detailed LEMP will be updated to document and thereby secure commitment to ensure that the above length of hedgerow is delivered, and the trading rules are met.</p>	Under discussion
7-6	S42 Consultation response to 2024 Consultation	Breeding bird survey reports	NKDC note that approach to breeding bird surveys is appropriate for most species, with request for further information as to how breeding bird survey methods were developed to cover Schedule 1 protected species, as survey effort relating to quail was less than appropriate.	<p>The potential presence of Schedule 1 protected bird species was considered in the survey methods. The breeding bird surveys undertaken in 2023 were considered of sufficient survey effort for most Schedule 1 bird species likely to be present. Exceptions to this were for quail and barn owl, which would usually require more tailored survey methods. Surveys for quail would usually involve surveys at dusk. However, as quail were recorded during the daytime surveys, (despite being a difficult and ephemeral breeding bird species that can appear almost anywhere) it was therefore deemed sufficient survey effort to inform on the presence of quail in order to make an assessment.</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>The ES is based on the assumption that quail could be present during construction.</p> <p>Barn owls were seen during the breeding bird surveys in 2023. Further barn owl surveys of barns and nest boxes within 250m of the Order Limits were subsequently undertaken in mid-June 2024 by a licensed surveyor to check for evidence of nesting. The surveys informed that barn owls are likely to be breeding near to the Site and are using areas within the Site for roosting and foraging. Details are in ES Volume 3, Appendix 7.4: Barn Owl Survey (Confidential) [EN010149/APP/6.3] [APP-085].</p> <p>Mitigation for birds is detailed in ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1.2] and survey details, with consideration of limitations, detailed in ES Volume 3, Appendix 7.2: Breeding Bird Survey (Confidential) [EN010149/APP/6.3] [APP-083]. The oLEMP [EN010149/APP/7.9.2] indicates how habitat creation and enhancement will be managed to deliver the appropriate mitigation for breeding bird species.</p>	Under discussion
7-7	S42 Consultation response to 2024 Consultation	Breeding bird survey reports	NKDC note that the nature conservation evaluation provided in the Breeding Bird Survey Report goes beyond the approach given in the method statement, but query use of dated approach (Fuller 1980).	<p>The Applicant considers that the methodology used for the breeding bird surveys was appropriate and had sufficient survey effort as it followed Bird Survey & Assessment Steering Group (2024): Bird Survey Guidelines for assessing ecological impacts. This survey method is considered as becoming the industry standard with regards to conducting breeding bird surveys.</p> <p>There is no specific recent guidance in terms of how assemblages of breeding birds should be evaluated. The</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
7-8	S42 Consultation response to 2024 Consultation	Hedgerows and trees	NKDC are in disagreement that hedgerows and trees can be scoped out with request for impact assessment to be proportionate to the relevant impacts and effects. NKDC request for a tree and hedgerow protection plan and arboricultural method statement.	<p>Applicant acknowledges that the approach taken by Fuller (1980) is slightly out of date and therefore made adjustments to this methodology. In addition, where possible, county bird records were also used to aid the context when arriving at the evaluation. It should be noted that the breeding and wintering bird assemblage have been identified as being of significant biodiversity value and impact upon then assessed accordingly. Survey details, with consideration of adjustments to methods and limitations, are detailed in ES Volume 3, Appendix 7.2: Breeding Bird Survey [EN010149/APP/6.3] [APP-083].</p> <p>Potential effects on habitats and species during construction (e.g. hedgerow loss) have been scoped in specifically for the construction phase as these are anticipated to be temporary. For example, while some hedgerow habitat would be 'lost' during construction, it would be re-instated or replaced by compensation hedgerow planting elsewhere. Overall, there would be a gain in the amount of hedgerow once established during the operational phase. Details of habitat creation and improvement measures are shown in the Outline Landscape and Ecology Management Plan [EN010149/APP/7.9.2] and details of impact assessment and mitigation are provided in ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1.2].</p> <p>A hedgerows survey has been carried out and is presented in ES Volume 3, Appendix 7.11: Important Hedgerows Survey [EN010149/APP/6.3] [APP-092]. Assessment of impact on hedgerows and hedgerow trees is discussed in ES Volume 1,</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>Chapter 7: Biodiversity [EN010149/APP/6.1.2], in addition mitigation will include 15km of new landscape planting.</p> <p>An Arboricultural Impact Assessment has been carried out, with a tree root zone protection plan presented in ES Volume 3, Appendix 7.12: Arboricultural Impact Assessment [EN010149/APP/6.3] [APP-093].</p> <p>Mitigation measures to avoid impact to habitats, including hedgerows and trees are also detailed in the Outline Construction Environmental Management Plan [EN010149/APP/7.7.2].</p>	
7-9	S42 Consultation response to 2024 Consultation	Offsets	NKDC note that minimum separation distances to all green features must be informed by a tree survey and constraints plan to consider Root Protection Zones.	<p>Details of the tree survey undertaken and plans showing root protection zones in relation to the Proposed Development are presented in ES Volume 3, Appendix 7.12: Arboricultural Impact Assessment [EN010149/APP/6.3] [APP-093]. The plans show separation distances from tree root protection zones and these have been considered within the design.</p> <p>A buffer of 15 m from crown has been applied to Ancient Semi natural Woodland (ASNW) as per guidance from Natural England and Forestry Commission (2022) Guidance Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (standing advice).</p> <p>Design commitments, including buffer zones such as a minimum 15 metre offset from areas of woodland, have been informed by the recommendations of BS 5837:2012 – Trees in relation to design, demolition and construction – Recommendations, to</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				ensure appropriate protection of retained trees and woodland throughout the lifetime of the development.	
7-10	S42 Consultation response to 2024 Consultation	Scoping	NKDC are in disagreement with the Applicant's rationale to scope species with reference to specific phases of the Proposed Development, as impacts occurring at construction could be permanent.	Potential effects on habitats and species during construction (e.g. hedgerow loss) have been scoped in specifically for the construction phase as these are anticipated to be temporary. For example, while some hedgerow habitat would be 'lost' during construction, it would be re-instated or replaced by compensation hedgerow planting elsewhere. Overall, there would be a gain in the amount of hedgerow once established during the operational phase. Details of habitat creation and improvement measures are shown in the Outline Landscape and Ecology Management Plan [EN010149/APP/7.9.2] and details of impact assessment and mitigation are provided in ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1.2] .	Under discussion
7-11	S42 Consultation response to 2024 Consultation	Vegetation	NKDC note that proposed vegetation removal should be surveyed to BS5837 to establish its arboriculture value and appropriate mitigation. NKDC note that retained vegetation should also be protected to BS5837.	An arboricultural impact assessment survey was carried out of vegetation within the Site to establish arboriculture value and appropriate mitigation (as per BS5837). This is detailed in ES Volume 3, Appendix 7.12: Arboricultural Impact Assessment [EN010149/APP/6.3] [APP-093] .	Agreed

Table 8 – Climate

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
8-1	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Alternatives	<p>NKDC request for GHG emissions to account for 'alternatives' in the context of GHG offsets to reflect revised layouts or overall energy generation capacity in relation to BMV land considerations.</p> <p>See NKDC's response to ExQ1</p>	<p>The scope of this assessment consisted of the calculation of all emissions associated with the construction, operation (including maintenance and replacement), and decommissioning of the Proposed Development, in line with IEMA guidance, as well as a calculation of the anticipated GHG savings from the Proposed Development as a result of displacing fossil fuel based energy in the national electricity network. Results of these assessments were then used to determine the net GHG impact of the Proposed Development. Accounting for 'alternatives' in the context of GHG offsets is not considered to be necessary, was not covered within scoping, and is not required under IEMA guidance.</p> <p>The assessment carried out in ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1] [APP-048] presents a worst-case scenario regarding GHG emissions associated with the Proposed Development.</p>	Under Discussion
8-2	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Carbon sequestration	<p>NKDC request for quantification of the carbon sequestration potential of new planting.</p> <p>NKDC understand the response and is not necessary to calculate but would like the applicant to propose measures to carbon sequester alongside the in-situ</p>	<p>The expected carbon sequestration potential of new planting would be less than 1% (96,000 tCO₂e) of the change in total emissions and therefore was not considered further.</p> <p>IEMA's Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022) states: "<i>activities that do not significantly change the result of the assessment can be excluded where expected emissions are less than 1% of total</i></p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			development, and look to improve the soil conditions by consideration of species planted under the panels. We understand that species selection should not be detrimental to the installation, however they should be selected to improve the soil. If the land is returned to agricultural use, species selection should not be detrimental to the alternative potential value towards future food security.	<p><i>emissions, and where all such exclusions total a maximum of 5% of total emissions, all exclusions should be clearly stated."</i></p> <p>The Applicant has updated the oLEMP [EN010149/APP/7.9.2] to state that grassland under the Solar PV modules will be managed as legume-rich modified grassland to provide biodiversity benefit and improve soil health. A suggested legume and flower mix is provided in Appendix 4 of the oLEMP [EN010149/APP/7.9.2] based on the successful establishment of similar mixes by the landowner. Should the DCO be granted consent, details of the final species mixes will be submitted for approval by the relevant planning authority with each LEMP(s) and must be substantially in accordance with the oLEMP [EN010149/APP/7.9.2] The updated oLEMP [EN010149/APP/7.9.2] will be submitted at Deadline 1 and is secured by Requirement 8 of the Draft DCO [EN010149/APP/3.1.2].</p>	Under Discussion
8-3	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Payback period	NKDC request for data relating to expected payback period for all estimated emissions to be calculated and presented in the ES, based on a worst case scenario of the country and method of component manufacture and associated transportation.	A reasonable, worst-case scenario has been adopted throughout this assessment, including assumptions concerning source countries of components, method of component manufacture, and associated transportation. When assessed against operational emissions, which is the methodology adopted by the Department for Energy Security and Net Zero (2024), the Proposed Development has an emissions payback period of three years. When assessed against whole lifecycle	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>Payback calculations should be further expanded to show workings and year on year negative and positive carbon emissions. Only a statement is provided with no supporting information within the ES. It is the applicant's responsibility to show workings and calculations to evidence outcomes reached.</p>	<p>emissions, the Proposed Development has an emissions payback period of ten years.</p> <p>The payback period of the Proposed Development is included in ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1] [APP-048].</p> <p>These payback periods are calculated from the figures presented earlier in the Chapter:</p> <ul style="list-style-type: none"> - operation-only emissions are 954,474 tCO₂e, lifecycle emissions are 3,004,796 tCO₂e (Table 8.14) - "the operation of the Proposed Development displaces 12.7 million tCO₂e that may have otherwise been emitted from gas generated electricity." (Section 8.9.3) <p>12.7 million tCO₂e divided by the lifetime of the development (40 years) is 316,266 tCO₂e emissions saved per year. Dividing by the operational and lifecycle emissions detailed above, results in a payback time of 3 and 10 years respectively. This is a conservative assumption, as in reality, due to the degradation rates of the panels, annual generation (and therefore GHG emissions savings) will be greater in the initial years and taper throughout the lifetime of the development.</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
8-4	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Replacement of equipment	<p>NKDC is in disagreement with assumed replacement of equipment, stating that replacement of panels would be higher than factored into assessments, and referring to assumptions given for the proposed Heckington Fen. NKDC request for further justification.</p> <p>It is not clear from the ES if it is a worst-case scenario or just industry standard for standard developments and not specific to solar farm installations. Considering the total lifespan of the development and the recognised degradation factor of 0.4% per annum, NKDC would expect elements such as the solar PV to have a service life of less than 40 years, proportionally. The focus in the ES appears to be on the BESS, which will be significant; however, there will be expected PV module replacement and therefore some emission considerations (see ES chapter 8</p>	<p>A reasonable, worst-case scenario has been adopted throughout this assessment, including assumptions concerning replacement rates of equipment. Assessments have been completed using aggregated data and experience from other solar projects which is considered to represent a realistic worst-case scenario.</p> <p>Replacement rates of components, including those for panels, have been presented in Table 8.5 in ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1] [APP-048].</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			p19, table 8.12). It should be noted that the West Burton solar project calculated emissions associated with the replacement of PV modules (see West Burton ES, p 40-41, table 7.24).		

Table 9 – Connecting to the Grid

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
9-2	Relevant Representation and Subsequent Correspondence	Grid Connection to proposed National Grid Navenby Substation	<p>NKDC notes unclear timelines between the Proposed Navenby Substation and Springwell Solar project which could impact deliverability.</p> <p>Potential impact of delays to the National Grid timetable with regard to the planning process.</p> <p>The NGNS is locally controversial, and planning permission is not guaranteed. The applicant must account for potential delays due to appeals or legal challenges. Although a grid connection is secured, the NGNS cannot proceed without planning permission and post-decision condition discharges. The applicant should provide evidence that there are no obvious reasons for the NGNS application to be refused.</p> <p>See NKDC LIR and WR</p>	<p>The Applicant has included information in relation to the proposed National Grid Navenby Substation in its Application, in particular within ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2], and the Grid Connection Statement [EN010149/APP/7.6.2].</p> <p>As recorded in the Grid Connection Statement [EN010149/APP/7.6.2], the Applicant has a grid connection offer at the proposed Navenby Substation, and the Applicant is aware that National Grid intends to seek planning permission for the substation by way of a Town and Country Planning Act (1990) Application to NKDC.</p> <p>The Applicant is not aware of any obvious reason why the proposed Navenby Substation would not receive planning permission. In terms of the suggestion that the commencement of the Proposed Development should be in some way be restricted based on milestones achieved for the Navenby Substation, there is no justification for this approach. Firstly, the Applicant already has its grid connection offer. Further, the Applicant considers that such a requirement could prevent the Proposed Development from being carried out in a timely and efficient manner, which is not appropriate having regard to the urgent need to deliver renewable energy.</p> <p>Finally, the Applicant's decision to commence construction of the Proposed Development would also be driven by commercial considerations, and it is highly unlikely that the Applicant would construct the Proposed Development without sufficient</p>	Under discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			Awaiting ExQ1 response / comments.	confidence that a grid connection would be in place for the export of the energy generated.	
9-3	Relevant Representation and Subsequent Correspondence	Grid Connection to proposed National Grid Navenby Substation	<p>NKDC note that any delay in a grid connection would reduce the potential benefits of the solar farm providing renewable energy before the government's target date of 2030 and therefore may impact the planning balance.</p> <p>During the Examination, the Council will seek to ensure that an additional Requirement is provided to restrict the commencement of the Springwell solar farm until the NGNS has reached a meaningful point of construction that gives certainty to the provision of the substation within the anticipated timescale and to ensure alignment between the projects.</p>	<p>Detail of the Proposed Development's grid connection can be found in the Grid Connection Statement [EN010149/APP/7.6.2]. This is also available on the 'TEC Register' which is found on National Energy System Operator (NESO) website.</p> <p>Should the proposed National Grid Navenby Substation be delayed, NESO would be required to offer new connection dates to the Applicant. This would likely lead to a delay in the Proposed Development being constructed and commissioned. If the proposed National Grid Navenby Substation did not proceed, the Applicant would expect a revised grid connection to be offered at an alternative point of connection into the NETS.</p> <p>The Applicant's preferred scenario is to connect at the proposed National Grid Navenby Substation, at the earliest date possible, to supply the grid with renewable energy and help towards the UK's goal of 70GW of operational solar by 2035. The Statement of Need [EN010149/APP/7.1] [APP-0135] provides evidence on the urgent need for the Proposed Development.</p>	Not Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>See NKDC LIR and WR. Awaiting ExQ1 response / comments.</p> <p>Further NKDC comments on Applicant's response:</p> <p>NKDC interpret the comments that Springwell will still proceed if the NGNS does not happen, however, how it will be achieved is not clear as the proposed site has been justified through the site selection principles based on the location of the substation providing the grid connection. An alternative grid connection location could potentially necessitate a different location for the BESS, Springwell substation and grid corridor which will have different environmental impacts.</p> <p>It is noted that no alternative connection point has been identified through the course of pre-application discussions. It is the Council's</p>		

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>understanding that no alternative exists ergo that the application is predicated solely/exclusively on the NGNS as its connection point.</p> <p>The ability to provide renewable energy in line with the aspirations of the Clean Power Action Plan 2030 connection would lend additional weight to the proposals in the planning balance than if the production of renewable energy was delayed until after this date.</p>		

Table 10 - Construction

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
10-1	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Working hours	<p>NKDC requests for revision of proposed working hours, including no work on weekends or public holidays where residents could be disturbed.</p> <p>NKDC's recommended proposed working hours are:</p> <p>Construction working hours on site should be from 7am to 6pm Monday through to Friday and 8am to 1pm on Saturdays with no noisy construction work on Sundays or Public Holidays.</p>	<p>Construction working hours on site would be from 7am to 7pm Monday through Friday and 7am to 12 noon on Saturday. No working would be permitted on Sundays or Bank Holidays.</p> <p>A variety of Best Practical Means are proposed to limit impacts to the local community during the construction phase (as set out in the Outline Construction Traffic Management Plan [EN010149/APP/7.8.2] and Outline Construction Environmental Management Plan [EN010149/APP/7.7.2]). This includes the use of temporary hoarding around construction works close to nearby properties.</p> <p>Construction impacts have been assessed and are detailed in ES Volume 1, Chapter 12: Noise and Vibration [EN010149/APP/6.1] [APP-052]. Impacts are anticipated, primarily during the trenching works between Springwell Central and Springwell West however, these are considered to be of short duration and not significant.</p>	Under Discussion

Table 11 – Cultural Heritage

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
11-1	Relevant Representation and Subsequent Correspondence	Above ground heritage assets	<p>NKDC notes the lack of detailed analysis of individual assets and limited information as why individual heritage assets have been scoped out. There has been a broad-brush approach and de-scoping en-masse within groups. There is very limited information within the groups as to why individual heritage assets have been scoped out of the analysis.</p> <p>NKDC consider that this generalised approach fails to consider the impact on individual assets and appears to rely heavily on embedded mitigation.</p> <p>While a group approach may be acceptable for village centres with enclosed views within a 5km study area, a detailed understanding of individual significance is needed for buildings with the greatest impact and heritage assets.</p> <p>See NKDC LIR and WR. It is also understood that the applicant will be providing further background information to the ExA to evidence the approach taken in the ES regards the assessment of above ground individual assets.</p>	<p>The Applicant has engaged further with the NKDC Conservation Officer and archaeological advisors regarding the receptors and matters scoped in/out of the ES.</p> <p>The Applicant considers that the 5km study area for designated heritage assets and 2km study area for non-designated heritage assets used for ES Volume 3, Appendix 9.1: Archaeological Desk- Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [AS-014] is appropriate as it follows the published guidance from LCC and refers to the ZTV for the Proposed Development.</p> <p>All designated heritage assets within 5km have been included individually in the gazetteer to ES Volume 3, Appendix 9.1: Archaeological Desk- Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [AS-014] along with the rationale for including or excluding them from the assessment. This includes the mills, the assets associated with Ashby Hall, the farmhouses, churches and scheduled monuments.</p> <p>The Applicant considers that the Archaeological Desk Based Assessment and Stage 1 Setting Assessment adequately identifies those heritage assets with potential for likely significant effects.</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
11-2	Relevant Representation and Subsequent Correspondence	Above ground heritage assets	<p>NKDC notes that there are clear demonstrable impacts on the heritage and built environment, and these have either been largely dismissed, or are reliant on a standard approach for mitigation, with no information provided regarding bespoke analysis and understanding of the heritage assets which may be impacted. Much of the proposal will lead to 'less than substantial harm' to the designated heritage asset and those impacts should be tested and understood to ensure the correct approach and mitigation has been applied.</p> <p>See NKDC LIR and WR. It is also understood that the applicant will be providing further background information to the ExA to evidence the approach taken in the ES regards the assessment of above ground individual assets.</p>	<p>All designated heritage assets within 5km have been included individually in the gazetteer to ES Volume 3, Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [AS-014] along with the rationale for including or excluding them from the assessment. The EIA is concerned with significant effects, non-significant effects have been presented within Appendix 5 of the Planning Statement.</p> <p>Mitigation for effects on built heritage asset has been embedded in the design which has responded to the individual settings of heritage assets. Discussion regarding the assessment of specific assets is ongoing.</p>	Under Discussion
11-3	Relevant Representation and Subsequent Correspondence	Non-Designated Heritage Assets	<p>NKDC notes that ES Chapter 9 does not consider their Local List of non-designated heritage assets which is required to demonstrate a full</p>	<p>No significant effects are predicted to the non-designated heritage assets due to their relative importance and these have been considered in the Archaeological Desk-Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [AS-</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>understanding of the built environment of the area around the site.</p> <p>See NKDC LIR and WR. It is also understood that the applicant will be providing further background information to the ExA to evidence the approach taken in the ES regards the assessment of above ground individual assets.</p>	014 which is presented in Appendix 9.1 of the Environmental Statement.	
11-4	S42 Consultation response to 2024 Consultation	Approach to assessment	NKDC note that the term 'ground disturbance' has not been defined.	<p>In the context of ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1.2] [AS-012], "ground disturbance" refers to those construction activities that result in topsoil stripping, earthworks or excavation. The piles for the solar arrays would also result in ground disturbance, however as this comprises disturbance over less than 0.1% of the total area of the Proposed Development this is considered to be a negligible amount. Further consideration of known and potential archaeological remains within the Site is set out in ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1.2] [AS-012] refers more specifically to the various construction activities impacts on the known and potential archaeological remains within the Site.</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
11-5	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Setting of heritage assets	<p>NKDC note that the setting assessment does not sufficiently consider the impact on heritage features, and further engagement is requested with particular reference to:</p> <ul style="list-style-type: none"> Mills which should be considered individually, with particular reference to Kirkby Green and Scopwick. Historic parkland with particular reference to Grade II listed Ashby Walled Garden. Grade II listed building 1280661Far/MLI86780 and impact of visibility from Scop/1135/3 (footpath) to Md02. Grade II listed building Ashby Hall and its grounds 1061827/1261470. Grade II farmhouse and coach house stables (1254329, 12544067) Blankney St Oswald's Church (1064285) associated listed buildings/undesigned assets and impact of C6 on views looking north along Scop/737/1. 	<p>All designated heritage assets within 5km have been included individually in the gazetteer to ES Volume 3, Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [AS-014] along with the rationale for including or excluding them from the assessment. This includes the mills, the assets associated with Ashby Hall, the farmhouses, churches and scheduled monuments.</p> <p>Scopwick Mill (LBEN 1280676) is a mid 19th century brick tower mill it survives to six storeys but the cap and sails are missing. The building derives significance from its architectural and historic interest as a post-medieval windmill, though the internal mechanism and floors were lost before 1992 and the attached former mill buildings had also been largely demolished by this time. The mill was converted to residential use between 2002 and 2005 when the internal floors to the tower were reinstated and new attached buildings in the style of the former mill structures were added. There are other examples locally of similar tower mills but Scopwick is the tallest. It is experienced as a prominent landmark feature particularly from the west and on the approaches along the road between Scopwick and Digby. In these views the agricultural surroundings, particularly the arable fields, provide appropriate context to the historic mill. The topmost floor of the</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<ul style="list-style-type: none"> Brauncewell medieval village Scheduled Monument ref 1018397 and Grade II listed Church of All Saints ref 1254135 Setting impacts upon Dunsby medieval village Scheduled Monument ref 1018395 Thompsons Bottom farmhouse and outbuildings (LBEN 1254329/1254407), Temple Farmhouse (LBEN 1254328) and Temple Bruer Knights Templar Preceptory Scheduled Monument ref 1007686 and Grade I Church Tower, north of Grade II Temple Farmhouse (SM - 1254328, LBEN 1261359) Home Farmhouse (LBEN 1061825) and Farmyard to the North of the Firs (LBEN 1280661). <p>NKDC accept the points made in respect of Temple Farmhouse, Home Farmhouse and the Farmhouse north of the Firs.</p>	<p>tower has a window facing northwest, whilst the other floors have windows facing southeast as well and the third stage of the tower (above the modern replacement to the attached buildings) has an external platform encircling the tower – also a modern replacement. These upper floors provide further more expansive views of the surrounding agricultural landscape. The agricultural landscape provides appropriate context to the historic mill and contributes to its significance. The design of the Proposed Development has sought to minimise the effect of the solar farm on the contribution that this landscape makes to the significance of the listed building by “pulling back” to southeast of a slight ridgeline that lies southeast of the mill. The closest solar arrays will therefore be over 400m southeast of the mill, there will be no panels to the northwest, panels to the northeast would be beyond Scopwick and panels to the southwest would be further away still. The Proposed Development is considered to result in a slight impact to the significance of the listed building (less than substantial harm) which is not significant and it was therefore scoped out of the ES.</p> <p>Kirby Green Mill (LBEN 1064295) is an 18th century water mill. It derives significance from the architectural and historic interest in its fabric as an example of its type, particularly for the recorded survival of its wheel and grinding machinery noted in the listed building</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>The new information regarding Scopwick Mill and Thompsons Bottom has not yet agreed. NKDC query whether the new information provided in the SOCG should be provided as a standalone document to the Examination as understood from previous meetings. The information relating to Kirby Green Mill, Blankney St Oswald's Church, Brauncewell medieval village and Dunsby medieval village is acceptable to the council.</p>	<p>description. The mill is associated with a millhouse and cottages which are separately listed. The mill is located on the river which provided power and this physical relationship with the watercourse contributes to the significance of the building by providing context to its historic function. The wider agricultural surroundings also contribute as they were the fields from which the grain ground at the mill was sourced. The closest solar arrays would be 730 m to the north beyond the settlement of Kirkby Green, the relationship between the mill and the watercourse and its associated buildings would not be altered, and the impact of the changes to the wider agricultural landscape to the significance of the mill would be slight (less than substantial harm) and not significant. This asset was therefore scoped out of the ES.</p> <p>Blankney St Oswald's Church (LBEN 1064285) is a 12th century parish church with 13th and 15th century alterations. The three stage west tower was rebuilt 1805-7, the church was restored c1820 and restored again 1879-81 by Carpenter and Ingelow. The church derives significance and its principal reason for designation from the architectural and historic interest in its fabric as an example of a medieval church with later alterations. The church also has associative value with named architects and with the Blankney estate. It is associated with a listed lych gate of 1883 by G. F.</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>Bodley and a number of non-designated memorials within the churchyard. These memorials contribute to the communal value of the church as the focus of worship and burial for the estate. The church is experienced both within this immediate setting of the churchyard and as a prominent feature on the “spires and steeples” walk and forms part of the Blankney Conservation Area which also includes estate cottages to the north. The Proposed Development has been designed to maintain visibility of the church tower from the footpath and the effect on the building’s significance of development in the wider rural surroundings is considered to result in a slight impact to the significance of the church (less than substantial harm) which is not significant. The church and associated lychgate were therefore scoped out of the ES.</p> <p>Brauncewell medieval village is assessed in the ES. This concluded that there would be a slight impact to the significance of the scheduled monument as a result of visibility of the Proposed Development in the wider rural setting of the monument. There would also be a beneficial impact as a result of the proposed permissive path. All Saint’s Church (LBEN 1254135) is the surviving parish church for Brauncewell village, it is experienced surrounded by the earthworks of the former village and a later farmhouse. The closest solar arrays would be over 500m to the north, the church will</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>continue to be experienced in association with the remains of the medieval village and later farmstead and the change to the wider rural surroundings as a result of the solar farm would result in a slight impact to the significance of the church (less than substantial harm) which is not significant and therefore the asset was scoped out of the ES.</p> <p>Dunsby medieval village derives significance and its principal reason for designation as a scheduled monument from its archaeological interest as the buried remains will contain evidence of the occupation of this settlement. The remains of the village are experienced within farmland and this rural setting although altered from the medieval field systems contributes to the significance of the monument as an abandoned settlement. The Proposed Development would be over 1km to the north and the ZTV predicts no visibility from the monument. LVIA visualisation 27 is from further north and shows the view overlooking land that was likely farmed from Dunsby towards the Proposed Development. The change to the wider rural surroundings of Dunsby will not impact on the archaeological interest of the monument and it was therefore scoped out of the ES.</p> <p>Ashby Hall Ashby Hall (LBEN 1061827) is a small country house dating to the early 16th century and late</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>18th century with later alterations and additions. It is associated with a separately listed ice house (LBEN 1261470) and walled garden (LBEN). Ashby Hall is experienced within landscaped grounds containing these associated structures to the north, a large pond to the east and significant mature trees to the boundaries. It is approached via a driveway from the south. The historic parkland associated with the hall extended further east and west than the current grounds and also included land south of Main Street encompassing Home Farmhouse and also Markham's Plantation and Rowston Covert woodland to the northeast. There are limited views of the wider landscape from Ashby Hall itself due to the surrounding vegetation and the nearest solar arrays would be over 1.2 km to the west and over 1.1 km to the north (beyond the walled garden) and the ZTV does not predict visibility of the arrays from the house. The ice house is experienced only within the grounds of the hall and derives significance from its architectural interest as a well preserved example and its group value with the house, as such the contribution of setting to its significance is confined to this immediate area. The walled garden derives significance from the architectural and historic interest in its unusual octagonal plan form and the surviving adjoining buildings which have been converted to residential use. It also has group value with the hall as an ancillary building to the country house. The garden is</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>experienced on the northern edge of the former grounds of the hall with other garden buildings to the north which provides an appropriate context to the walled garden. The wider agricultural setting is appreciated from the outside of the walled garden due to this area being more open, As with the hall the closest solar arrays would be over 1 km distant, the ZTV predicts visibility from the walled garden though this will be filtered by vegetation. The impact of changes in the wider landscape at this range would have a negligible impact on the significance of the house, ice house and walled garden. These assets were therefore scoped out of the ES.</p> <p>Temple Farmhouse (LBEN 1254328 and 1261359) comprises a 17th century farmhouse with late 18th, early 19th and 20th century alterations and the remains of the 13th century church tower which was restored in the early 20th century. The tower is all that remains above ground of the Knights Templars Preceptory which was abandoned at the dissolution in 1538 and is also designated as a scheduled monument. The farmhouse derives significance and its principal reason for designation as a grade II listed building from the architectural and historic interest in its fabric as an example of post-medieval farmhouse and the associative value for it being on the site of the Knights Templar's Preceptory. A small fragment of reused</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>medieval tracery survives in an upper window on the north gable of the farmhouse and the building is likely to incorporate other stonework from the preceptory adding to the architectural and historic interest of the building. The farmhouse is experienced within a farm complex of non-designated buildings with the listed and scheduled tower to the north, the presence of the tower in proximity to the farmhouse contributes to the associative historic interest and value of the farmhouse. The tower derives significance from the architectural and historic interest in its fabric, its associative value with the Knights Templar and archaeological interest and evidential value as a surviving remnant of a pre-Dissolution church. The nearest solar arrays to the farmhouse and tower will be over 1km to the east. The ZTV (ES Figure 10.5a) indicates that there is no visibility of the Proposed Development from Temple Farmhouse due to a slight ridge to the east of the farmhouse. LVIA Viewpoint 32 is taken from east of this ridge and shows limited visibility of the Proposed Development. The change to the wider agricultural surroundings beyond areas where the farmhouse is appreciated is considered to result in a slight impact (less than substantial harm) which is not significant. The Proposed Development will not impact on the prominence of the tower which will continue to be experienced within the farm complex, the change to the wider surroundings beyond the areas where the tower</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>is appreciated are considered to result in a negligible impact to its significance which is not significant. These assets were therefore scoped out of the ES.</p> <p>Home Farmhouse (LBEN 1061825) is an early 18th century farmhouse with 19th and 20th century alterations. It derives significance and its principal reason for designation as a grade II listed building from the architectural and historic interest in its fabric as an example of its type. The farmhouse is experienced on Main Street to the west of settlement of Asby de la Launde and southwest of Asby Hall, with a garden front to the east side and agricultural buildings enclosing a yard to the west with further later agricultural buildings beyond. The wider agricultural land which were likely farmed from Home Farm is filtered by these buildings and by mature trees to the south and southwest of the farmhouse. Proposed highways improvements are within 200m to the west of the farmhouse but will not impact on the contribution that the setting makes to its significance, the nearest solar arrays would be 1km to the west, beyond the modern agricultural buildings and further screened by vegetation. The ZTV (ES Figure 10.5a and 10.5b) indicates that although without vegetation the Proposed Development would be visible from the farmhouse, the existing vegetation provides significant screening. Viewpoints 21 is from further east within Ashby de la Launde, and Viewpoint 22 is from</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>further west on the road junction. Both show that the solar farm would be a distant feature, softened by existing and proposed vegetation. The impact on the significance of the listed building as a result of the change in this wider setting is considered to be slight (less than substantial harm) and not significant, it was therefore scoped out of the ES.</p> <p>Farmyard to the north of The Firs (LBEN 1280661) comprises a barn, cowsheds, stables and pigeoncote built in a single-phase c.1820. The buildings enclose a farmyard to the north of the non-listed farmhouse. It derives significance and its principal reason for designation as a grade II listed building from the architectural and historic interest in its fabric as an example of a single-phase complex of agricultural buildings. As an agricultural building the surrounding agricultural landscape contributes to its significance as it will include fields worked from the farm, however the farmyard is screened from the wider landscape by trees. The closest solar arrays would be 800m to the east of the farmyard. The closest solar arrays would be 800m to the east of the farmyard, the impact on its significance is considered to be slight (less than substantial harm) and not significant. It was therefore scoped out of the ES.</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>Thompson's Bottom Farmhouse (LBEN 1254329/1254407) comprises a 19th century farmhouse and separately listed range of farm buildings (stables and coach house) to the northwest (rear) of the farmhouse. To the east of the farmhouse is a non-listed barn and the access to the farmyard at the rear which contains other non-listed outbuildings including large agricultural sheds. These buildings provide context to the farmhouse as part of a working farm. East of the farmyard access are two non-listed cottages. The farm sits on the north side of Warren Lane, with the farmhouse set back beyond a small garden separated from the lane by a tall hedge. This hedge, the adjacent buildings, tree belts to the west and north of the farm and a small block of woodland to the south of Warren Lane opposite the farm serve to screen the listed buildings from view until in immediate proximity. The farm complex as a whole is experienced within a wider agricultural landscape and can be glimpsed on the approach along Warren Lane from the east. This setting provides appropriate context to the farmhouse and outbuildings. The Proposed Development extends to within 150 m of the farmhouse (for improvements to Warren Lane) with the closest arrays c. 300 m to the east of the farmhouse, a line of existing electricity pylons crosses the fields and Warren Lane at this point. Arrays will be present to the north and south of Warren Lane on the approach to the farmhouse but will be</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>screened by proposed new hedgerow planting (Viewpoints 29b, 29c, and Part 7 Viewpoint 35 in ES Volume 4 Visualisations: Part 6 [EN010149/APP/6.4] [APP-132]). The character of this eastern approach to the farmhouse will become more enclosed as a result of this planting, though it should be noted that there are the remains of a dry stone wall to the north side of the lane which indicate that the view was likely not always as open as it is presently. The alteration to the character of the wider surroundings around the farmhouse will slightly reduce the contribution that the setting makes to the significance of the listed buildings. This would result in an effect of minor significance and not significant and these buildings were therefore scoped out of the ES.</p>	
11- 6	S42 Consultation response to 2024 Consultation	Conservation areas	<p>NKDC request for more information on the approach to the setting assessment on Blankney and Scopwick Conservation Areas, including:</p> <ul style="list-style-type: none"> • how buffer zones have been informed • how impacts have been assessed including on listed buildings within the settlement. • how impacts have influenced the design of the Proposed Development 	<p>Buffer zones around the Blankney and Scopwick Conservation Areas have been informed through site visits to examine the contribution that their setting makes to their significance, including views into and out of the conservation areas.</p> <p>The Stage 1 Setting Assessment within ES Volume 3, Appendix 9.1 [EN010149/APP/6.3.2] [AS-014] has considered the listed buildings within the conservation areas (as well as all other designated heritage assets within the study area) and assessed the impacts with regard to Historic England guidance.</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>Potential impacts to the significance of the Church of St Oswald, Blankney (within the Blankney Conservation Area) were identified at an early stage of the assessment as views of the church from the Spires and Steeples Trail within the Order Limits contribute to the significance of this building. Solar PV development has been excluded from the field west of the Spires and Steeples Trail in order to maintain this view and avoid impacts on the significance of the building.</p> <p>The setting of Scopwick Conservation Area was also considered, although as there are limited views out of the conservation area and views into the conservation area from the surroundings are heavily filtered by vegetation, it has been considered that siting solar PV within closer proximity to Scopwick would not result in significant effects to the heritage significance of the conservation area.</p>	
11-7	S42 Consultation response to 2024 Consultation	Scheduled remains	<p>NKDC are in disagreement that the scheduled remains at Brauncewell can be scoped out of assessment and request for further justification.</p> <p>Other comments seek clarification on receptors to be included for further assessment as it is stated that the Scheduled remains of former villages of</p>	<p>The scheduled remains at Brauncewell have been scoped in as they are partly within the Order Limits and a permissive path is proposed across them.</p> <p>The scheduled remains at Dunsby are scoped out as they lie over 1km from the Order Limits and no visibility is predicted by the ZTV. Therefore, no effects will occur to this asset.</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			Brauncewell and Dunsby (operation) are proposed to be scoped in.		
11-8	S42 Consultation response to 2024 Consultation	Further assessments	NKDC notes that the assessments will require updating and additional surveys to reflect the area of the Proposed Development including the area of the Grid Connection Corridor.	The Archaeological Desk-Based Assessment and Stage 1 Setting Assessment (see ES Volume 3, Appendix 9.1 [EN010149/APP/6.3.2] [AS-014]) has been updated to reflect the additional area for the Grid Connection Corridor and revised ZTV. Additional geophysical surveys have been carried out, which are detailed in ES Volume 3, Appendix 9.4: Geophysical Survey Report [EN010149/APP/6.3] [APP-100] - [APP-105]. It is not considered that the geoarchaeological deposit model (see ES Volume 3, Appendix 9.2: Geoarchaeological Deposit Modelling Report [EN010149/APP/6.3] [APP-098]) requires updating to include the Grid Connection Corridor as the transects examined in the model provide sufficient information to address the queries raised by Historic England and the local authority archaeological advisors in response to the geophysical survey results.	Agreed
11-9	S42 Consultation response to 2024 Consultation	Green Infrastructure	NKDC note that Green Infrastructure and areas for mitigation, enhancement and/or retained agricultural land could have potential impacts on surviving archaeology e.g. mitigation measures such as scrapes, wildlife ponds and tree	No scrapes or ponds are proposed. Tree planting would be limited to hedgerow enhancements and a proposed community growing area north of Scopwick. Further trenching as part of the Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148] would inform the detailed design, including the nature of	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
	and Subsequent Correspondence		planting, but there is no indication that this has been considered or would be evaluated on mitigated. Refer to Lincolnshire County Council (LCC) LIR and WR	planting for the community growing area in order to minimise impacts on below ground archaeological remains.	Under Discussion
11-10	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Planning policy	NKDC note that relevant planning policy should include the Scopwick and Kirkby Green Neighbourhood Plan including Appendix E 'Non designated Heritage Assets'. See NKDC LIR and WR. It is also understood that the applicant will be providing further background information to the ExA to evidence the approach taken in the ES regards the assessment of above ground individual assets.	The list of non-designated heritage assets provided in Appendix E of the Scopwick and Kirkby Green Neighbourhood Plan has been considered within the Archaeological Desk-Based Assessment and Stage 1 Setting Assessment in ES Volume 3, Appendix 9.1 [EN010149/APP/6.3.2] [AS-014] . No significant effects are predicted to these non-designated assets.	
11-11	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	RAF Digby	NKDC note that there are no plans to consider the impact of the Proposed Development on views from RAF Digby (a non-designated heritage asset, MLI60621) and a more holistic approach is needed. See NKDC LIR and WR. It is also understood that the applicant will be providing further background information	Views from RAF Digby have informed the proposed layout. As noted in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050] , no above ground structures are proposed within immediately adjoining fields or within approximately 1km of the main residential barracks in RAF Digby. A gentle ridge to the east of the B1191 (Heath Road) together with established woodland separates the residential barracks from Springwell Central. No	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			to the ExA to evidence the approach taken in the ES regards the assessment of above ground individual assets.	significant effects are predicted to this non-designated heritage asset or the designated heritage assets within RAF Digby.	
11-12	Relevant Representation and Subsequent Correspondence	Archaeology - Adequacy of trial trenching	<p>NKDC have significant concerns over the amount of trial trenching undertaken within the 1280- hectare site. The Applicant has completed 196 trenches, each 50m by 1.8m. The trenching thus represents slightly over 0.1% of the full red line boundary. Approximately 99.9% of the site has not been evaluated.</p> <p>The current 0.1% trenching sample is inadequate, with regional guidance suggesting a minimum of 3-5% for effective assessment.</p> <p>NKDC indicates that the programme for archaeological works must cover an appropriate amount of trenching and adhere to the Handbook's requirements for excavation, recording, and other processes.</p> <p>See LCC's LIR and WR</p>	<p>Agreement was reached with the local archaeological advisors regarding the methodology for the trial trenching. The trenching was carried out in accordance with the approved Written Scheme of Investigation and reported in ES Volume 3, Appendix 9.5: Archaeological Trial Trenching Report [EN010149/APP/6.3] [APP-106].</p> <p>Trial trenching carried out over the five proposed areas for potential infrastructure (Springwell Substation, BESS and Collector Compounds) included testing apparently "blank" areas in the geophysical survey results where there were no apparent archaeological remains. The strong correlation between desk-based assessment, aerial investigation and mapping, geophysical survey and trial trenching results indicates that beyond the areas of identified archaeological remains, it is unlikely that there are substantial areas of currently unknown remains.</p> <p>The Applicant considers that the evaluation carried out to date provides adequate information to inform the Application. A further programme of archaeological</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
11-13	Relevant Representation and Subsequent Correspondence	Archaeological Potential – Approach to assessment	The Applicant has indicated further archaeological works will be undertaken post-consent. Whilst NKDC welcome the proposed additional trenching, best practice, as stated within Historic England Advice Note 17, is that this would have been undertaken prior to submission of the DCO and needed to be of the full redline boundary, in accordance with NPPF, EIA Regulations and National Policy Statement EN-1. See LCC's LIR and WR	work, as set out in the Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148] and secured through a DCO Requirement would be carried out to inform the detailed design of the Proposed Development, including measures to protect the known archaeological remains within the areas proposed for solar PV development. It would also be used to mitigate potential impacts of cable routing. These mitigation measures are set out in the ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1] [APP-049] and Outline Construction Environmental Management Plan [EN010149/APP/7.7.2] and would prevent unnecessary destruction of heritage assets. These works have been factored into the project programme.	Under Discussion
				The Applicant considers that extensive archaeological trial trenching pre-determination where the geophysical survey results provide clear information on the below ground archaeological potential is disproportionate to the impacts of the Proposed Development.	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
11-14	Relevant Representation and Subsequent Correspondence	Archaeology – Outline Written Scheme of Investigation	<p>NKDC has concerns with the outline Written Scheme of Investigation. Noting that it excludes ecological enhancement areas from trenching, but they need to be included to identify any archaeological remains.</p> <p>See LCC's LIR and WR</p>	<p>The Applicant has submitted an Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148] with the application noting that post-consent authorised development must be carried out in accordance with the document.</p> <p>The Outline WSI itself sets out the processes by which the various authorities will be involved in the development of the detailed archaeological mitigation measures.</p> <p>The management plan is a live document that will be discussed throughout the course of examination and discussions can be held regarding the information included.</p>	Under Discussion
11-15	Relevant Representation and Subsequent Correspondence	Archaeology – Requirement 11	<p>NKDC suggest that the proposed Requirement 11 covering archaeological works post-consent is not appropriate or fit for purpose. The wording currently suggested is vague and unenforceable. NKDC advise that the wording accepted at the Mallard Pass, Cottam and West Burton Solar Farms, is included for Springwell, should the scheme be consented. The wording utilised within the Mallard Pass Requirement has been deemed to be appropriate and allows for an enforceable and robust level of</p>	<p>Mallard Pass included a requirement (6) for detailed design approval which required that “<i>details... demonstrate how they have taken account of the results of any archaeological investigations or archaeological evaluations carried out pursuant to the outline written scheme of investigation</i>” it is agreed that this would be an appropriate insertion to suggested DCO Requirement 5 of the Proposed Development.</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			archaeological works to be undertaken and appropriate mitigation, informed by sufficient evaluation, to be deployed. See LCC's LIR and WR		

Table 12 – Cumulative Effects

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
12-1	S42 Consultation response to 2024 Consultation	Approach to assessment	NKDC request that two live planning applications for TCPA 1990 solar development referenced 23/1419/FUL (Mareham Lane Screddington) and 23/1021/FUL (land at Little Hale Fen) are included within the short-list of existing development.	<p>Mareham Lane (23/1419/FUL) has been included in the short-list of cumulative developments as it met the criteria for inclusion. An assessment of inter-project cumulative effects is included within ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].</p> <p>Little Hale Fen (23/1021/FUL) has not been assessed as it does not meet the short-list criteria outlined in ES Volume 1, Cumulative Effects [EN010149/APP/6.1.2]. The development is located approximately 12km from the Proposed Development and is outside the Zone of Influence of 10km that has informed the short-list of other existing development and/or approved developments that have been assessed within ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].</p>	Agreed
12-2	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Approach to assessment	<p>NKDC are in agreement with general commentary in relation to cumulative effects of the Proposed Development in combination with Fosse Green, Heckington Fen and Beacon Fen and that these are scoped into assessment.</p> <p>NKDC also request that the long and short lists of other existing developments should be kept under review.</p>	<p>An assessment of inter-project cumulative effects with other existing development and/or approved developments, which includes the Fosse Green Solar Farm, Heckington Fen and Beacon Fen is presented in ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].</p> <p>The Applicant remains committed to updating the cumulative long list as new developments come into the public domain, ensuring that the assessment remains as</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			The applicant should include the Leoda solar farm NSIP as well as the Green Man Road and Coleby BESS applications.	<p>accurate and comprehensive as possible throughout the examination process.</p> <p>The Applicant has updated the Cumulative Assessment at Deadline 1 to consider the Leoda Solar Farm. The cumulative assessment will be updated in full at Deadline 2 to consider all other relevant developments that fall into the short list, which have been recently submitted to NKDC.</p>	
12-3	S42 Consultation response to 2024 Consultation	Biodiversity	<p>NKDC note that consideration should be given to cumulative substantive habitat changes arising from other solar NSIP proposals in Lincolnshire alongside consideration of construction disturbances, as potential consequences for biodiversity and magnitude of change at landscape scale are not adequately defined and understood. Specific concern is impacts on ground-nesting birds.</p> <p>NKDC are in agreement that efforts to mitigate the impact of the Proposed Development would help to remove potential for cumulative effects with other similar schemes close to the site boundary, and this should be detailed in the ES.</p>	<p>The Applicant has further considered its assessment of the potential long-term cumulative impact of habitat change (during the operational phase) rather than just assessment during the (relatively short-term) construction phase.</p> <p>The effects of habitat change/loss of open arable land on ground nesting birds has been a key consideration in the design of the Proposed Development. Over 100ha of grassland habitat is proposed to be created to provide enhanced quality nesting habitat for ground nesting birds (based on number of skylark territories identified on Site). Other habitat creation and enhancement measures to increase foraging habitat include enhancement of field margins (wild bird seed plant mixes, arable flora enhancement, tussocky grassland), herbal ley and grassland treatments under solar PV modules and 15,563m of new hedgerow and 16ha of new tree belts.</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>Although there would be an adverse effect on ground nesting birds during the construction phase, this would be relatively short-term and is not considered significant. It is anticipated that the habitat creation and enhancement proposals would provide a significant benefit to farmland birds once established and appropriately managed for the duration of the operational phase. Therefore, this would remove the potential for adverse cumulative effects with other developments in proximity to the Order Limits. Details of habitat creation, enhancement and management proposals are in the Outline Landscape and Ecology Management Plan [EN010149/APP/7.9.2].</p> <p>The embedded design and additional mitigation measures proposed to reduce the potential impacts identified, and therefore to remove potential for cumulative effects, with specific consideration to impacts on ground-nesting birds, wintering birds and bats, is discussed in the ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1.2].</p> <p>The cumulative effects of other developments and their mitigation proposed (where information is available) on ground nesting birds, wintering birds, bats and other receptors has been considered and discussed in ES Volume 1, Chapter 16: Cumulative Impacts [EN010149/APP/6.1.2].</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
12-4	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Land, soil and groundwater	<p>NKDC are in agreement with the Applicant's commitment to review the cumulative availability of BMV land in the region in agreement with statutory consultees.</p> <p>NKDC suggest that all registered solar NSIPs in Lincolnshire should be considered in relation to cumulative assessment on agricultural land.</p> <p>See NKDC response to ExQ1</p>	<p>The Applicant is grateful for engagement with NKDC and LCC on this matter and welcomes further engagement if required.</p> <p>An assessment of the temporary loss of BMV agricultural land from solar developments in Lincolnshire and within 1km of the Nottinghamshire boundary has been undertaken, as detailed in ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2].</p>	Under Discussion
12-5	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	National Grid Navenby Substation	<p>NKDC note that relevant assessments, as well as the overall cumulative assessment should take into account cumulative effects of the proposed National Grid Navenby Substation, noting the effects could be permanent. Specific topic areas raised include:</p> <ul style="list-style-type: none"> Traffic and transport (construction) Noise and vibration (construction and operation) Agricultural land (construction and operation) Landscape and visual impact (construction and operation) 	<p>An assessment of the inter-project cumulative effects with other existing development and/or approved developments, which includes the proposed National Grid Navenby Substation is provided in ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2]. This assessment considers the potential combined impacts of Springwell Solar Farm alongside other nearby projects and outlines that no significant inter-project cumulative effects are anticipated.</p>	Disagree

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<ul style="list-style-type: none"> Biodiversity (construction and operation) <p>GHG impacts (construction and operation) as the Proposed Development should be liable for a proportion of the emission relative to its connection agreement.</p> <p>See NKDC LIR and WR</p>		

Table 14 - Design

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
14-1	Email and Meeting Correspondence, and Subsequent Correspondence	Approach to good design	<p>NKDC agreed with the Applicant's approach to good design and were consulted on this matter throughout the engagement process. This includes the application of design principles to guide decision making and embed good design outcomes to the Proposed Development which will be secured via Control Documents within the draft DCO.</p> <p>These comments are without prejudice to the Council's position on LVIA and heritage impacts as stated elsewhere in the SOCG.</p>	<p>The Design Approach Document [EN010149/APP/7.3.2] sets out the Applicant's approach to good design.</p> <p>It demonstrates how the Proposed Development would fulfil the requirement for good design and demonstrate adherence to the mitigation hierarchy (to avoid, reduce, mitigate, compensate) set out and required within the Overarching National Policy Statement (NPS) for Energy (EN-1) (2023) and the NPS for Renewable Energy Infrastructure (EN-3).</p> <p>It explains how good design has been embedded into the Proposed Development from the outset of the design process via a clear design framework and the application of design principles. This has provided a shared understanding of desired outcomes for the Proposed Development and informed decision making.</p> <p>It explains the way in which the design has evolved since inception, the rationale for the proposals contained within the DCO Application, and the mechanism by which good design would be secured post-consent.</p> <p>The approach to good design was discussed with NKDC at key meeting throughout the engagement process (as outlined in Table 1: Record of Engagement). This included an overview of the design approach and the use of design principles (01/06/23), presentation of the Project Principles</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				(14/09/23) and presentation of the securing mechanisms (12/09/24).	
14-2	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Design principles	<p>NKDC support for the principle of removing fields, or parts of fields, from development where they comprise wholly or partially BMV land.</p> <p>These comments are without prejudice to the Council's position on LVIA and heritage impacts as stated elsewhere in the SOCG.</p>	<p>The design of the Proposed Development has been guided by the Project Principles set out with the Design Approach Document [EN010149/APP/7.3.2]. This includes retaining all fields comprising solely of Grade 1 or 2 land within the Site as available for arable production (Principle 8.1); prioritising the use of BMV land for arable production where practicable (Principle 8.2); and prioritising the use on non-BMV land for habitat creation where practicable (Principle 8.3).</p> <p>A summary of how the design of the Proposed Development has evolved to respond to each of these Project Principles is provided in the Design Approach Document [EN010149/APP/7.3.2].</p>	Agreed
14-3	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Design principles	<p>NKDC support for the principle of removing fields, or parts of fields from development to reduce impacts on the Spires and Steeples Way.</p> <p>These comments are without prejudice to the Council's position on LVIA and heritage impacts as stated elsewhere in the SOCG.</p>	<p>The design of the Proposed Development has been guided by the Project Principles set out within the Design Approach Document [EN010149/APP/7.3.2]. This includes developing the design to protect the amenity of the Spires and Steeples Trail, avoiding any Solar PV development between the route and the B1188 (Principle 5.2).</p> <p>This has included discounting Solar PV development from all adjoining fields within the Order Limits west of the</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>footpath (Fields C7, Md03, Md04 and Md05) and north of Scopwick (Field Md02). As a result, Solar PV development would only be located adjacent to the Spires and Steeples Trail for a short stretch of the route (approx. 250m in Fields C6, C8 and C9). This would minimise the potential visual effects on users of the footpath and ensure no views of the churches at Blankney or Scopwick would be interrupted by the Proposed Development. This is secured by the spatial extents shown on the Works Plans [EN010149/APP/2.3] [APP-007].</p> <p>Where Solar PV development is proposed adjacent to the Spires and Steeples Trail, mitigation measures are proposed to reduce the potential effects on footpath users. This includes a Design Commitments [EN010149/APP/7.4] [APP-0138] to offset the perimeter fencing surrounding Solar PV development by at least 15m to all PRoW. In addition to this, a larger offset would be provided at the north-west corner of Field C6 where the footpath follows the corner of the field boundary.</p>	Agreed
14-4	S42 Consultation response to 2024 Consultation	Embedded mitigation measures	NKDC request for the Applicant to clarify whether proposed buffer zones are derived from guidance, good practice, precedence from other solar NSIPs, professional judgement or a combination.	<p>The identification of all buffer zones is derived from a combination of guidance, good practice, precedence set by other NSIP solar schemes and professional judgement from technical specialists of the project team.</p> <p>For example, there would be a minimum 15m offset from the proposed built development to any existing woodland in accordance with guidance published by Natural England</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				and the British Standards Institution for tree root protection areas.	
14-5	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Enhancements	<p>NKDC supports the development of Green Infrastructure /proposals for recreation and amenity improvements, which should be maximised and integrated within the Proposed Development</p> <p>NKDC request for further engagement with the host authorities and other interested parties in relation to these elements.</p> <p>Agreed without prejudice to NKDC's comments on maximising provision of BNG.</p>	<p>The Applicant is committed to continuing to engage proactively with stakeholders in the design of Green Infrastructure and amenity and recreation improvements that the Proposed Development could deliver.</p> <p>Following Phase Two Consultation, the Applicant continued to engage with stakeholders, including the host authorities, on the design of the Proposed Development. This included dedicated meetings with LCC Highways and Public Right of Way Office on potential amenity and recreational improvements in April 2024. The Applicant also met with NKDC and its appointed ecologist on 23 July 2024 to discuss the development of the green infrastructure and biodiversity strategy proposals.</p> <p>Details of the proposed enhancements to the green infrastructure network are presented in the Design Approach Document [EN010149/APP/7.3.2] and include the provision of 3.49km of new PRoW, 8.58km of permissive paths, improvements to the Spires and Steeples Trail and a new community growing area.</p>	Agreed

Table 15 – Glint and Glare

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
15-1	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Approach to assessment	NKDC note that glint and glare impacts have not been demonstrably resolved as impacts on the A15 and a property have been identified.	Potential glint and glare effects towards the A15 and dwellings within the assessment area have been resolved through the development of the design and implementation of landscape planting.	Agreed
			No issues regarding glint and glare have been raised in NKDC's LIR.	Screening in the form of existing and proposed vegetation, buildings and/or intervening terrain is predicted to significantly obstruct views of reflecting panels, such that solar reflections would not be experienced. For a small location on the A15, a temporary screen would be implemented to allow proposed vegetation to reach a sufficient height and density to mitigate impacts. The assessment has concluded that for 99 dwellings, no impact is predicted. For four dwellings, a low impact is predicted because of marginal views and the duration of effects. This is not considered significant, and no further mitigation is required. Further detail on the assessment is provided in ES Volume 3, Appendix 5.4: Glint and Glare Study [EN010149/APP/6.3.2] .	
15-2	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Mitigation	NKDC note that landscaping should not be relied upon to mitigate identified glint and glare effects as it would require time to mature. NKDC is aware that advance planting was carried out in early 2025. Agreement is subject to the	The Applicant acknowledges that new planting would take time to mature and has committed to advanced planting (prior to installation of solar panels) as part of the Proposed Development. This would include planting adjacent to the A15 for a 700m section of this road to mitigate potential glint and glare effects upon road users.	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>advance planting being subject to a maintenance and monitoring regime including the replacement of any dead or dying vegetation.</p> <p>NKDC will raise concerns about the assumed growth rate in its LIR and WR.</p>	<p>The assumptions and details of the advanced planting are outlined below:</p> <ul style="list-style-type: none"> - Advanced planting would be implemented in Winter 2024 / 2025 during planting season. - Trees would be planted as young transplants or 'whips'. - Vegetation will need to be established to a height of 3m to provide effective mitigation of the glint and glare impacts. - The Proposed Development currently has phased grid connection dates of 2028 and 2030. It is currently anticipated that construction works will commence at the earliest in Q1 2027 and run to Q4 2030. - It is assumed that some parts of the Proposed Development (Springwell West) will become operational from 2029. - Advanced planting undertaken in Winter 2024 / 2025 is therefore anticipated to have at least 3 seasons growth before construction commences and more than this in some parts of the Site. - It is anticipated that the planting would be at least 1.8m high at the start of construction and 2.6m at the start of operation of the Proposed Development. <p>Based on the assumption that in year 1 that the planting stock would typically be at approximately 0.6m to 0.8m</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>high and contained with tree protected tubes and would not put on much growth during the first planning season and then put on an average of 0.4m growth each subsequent year. It is anticipated a temporary mitigation would be required for approximately 3 years following the construction phase.</p> <p>Until the advance planting (to be planted in Winter 2024/25) in this area has grown to sufficient density and height of 3m to mitigate impacts of glint and glare, temporary mitigation will be implemented to mitigate impacts. This temporary mitigation may include temporary screening or suitable alternative mitigation to be confirmed in the detailed LEMP. This would be removed once the hedgerows are of sufficient height. It is anticipated that a temporary hoarding or suitable alternative would be required for approximately 3 years following the construction phase. The landscape planting proposals are secured within the Outline Landscape and Ecology Management Plan [EN010149/APP/7.9.2]. The full green infrastructure has been considered within the glint and glare assessment (see ES Volume 3, Appendix 5.4: Glint and Glare Study [EN010149/APP/6.3.2]).</p>	

Table 16 – Landscape and Visual

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
16-1	S42 Consultation response to 2024 Consultation	A15	At statutory consultation, NKDC suggested that the A15 should be reclassified from having 'low' susceptibility and 'community' value due to its open views from a high number of receptors and regional usage.	<p>The 'susceptibility' and 'value' of the A15 was reevaluated in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050].</p> <p>Susceptibility has been reclassified from 'low' to 'medium/low' and the overall sensitivity of the receptor has been reclassified from 'low' to 'medium/low'. Further justification for these judgements is set out in the above chapter.</p>	Agreed
16-2	S42 Consultation response to 2024 Consultation	Application of Rochdale Envelope	<p>At statutory consultation, NKDC stated it was in agreement that the Rochdale Envelope could be applied to the PV panels, though there is concern about its application to larger elements of the Proposed Development due to the likely greater visual effects which depend on the final location and layout of these elements.</p> <p>NKDC requested that the location and 'worst case' extent of these elements are explicitly identified through works plans and/or parameter plans to allow for a better understanding of the potential landscape and visual effects, and ZTV figures produced on the worst-case parameters.</p>	<p>The approach to assessment is set out in ES Volume 1, Chapter 5: Approach to EIA [EN010149/APP/6.1] [APP-050].</p> <p>As explained fully in the above referenced chapter of the ES, it is necessary to maintain a degree of flexibility in the layout of the BESS and Springwell Substation. The Rochdale Envelope approach ensures that the reasonable 'worst-case scenario' has been assessed in the ES.</p> <p>Following Phase Two Consultation, the proposed locations of the BESS and Springwell Substation were each narrowed down to a single location. Therefore, the Application has provided greater certainty regarding the proposed location of these elements. Greater clarity has been provided in relation to the reasonable 'worst-case scenarios' assessed for landscape and visual effects in ES Volume 1, Chapter 10: Landscape and Visual</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>[EN010149/APP/6.1] [APP-050]. The parameters assessed (which represent the maximum parameters of development and therefore a 'worst-case scenario') are described in ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2]. Of particular relevance is also ES Volume 2: Figure 3.2 Height Parameters [EN010149/APP/6.2.2]. The ZTVs presented in ES Volume 2, Chapter 10: Landscape and Visual Figures [EN010149/APP/6.2] [APP-066] are also based on the maximum parameters identified for each component of the Proposed Development and therefore represent worst-case scenarios for each component.</p>	
16-3	S42 Consultation response to 2024 Consultation	Approach to assessment	NKDC are in agreement that the baseline assessment should include both Landscape fabric/ elements; and Landscape key characteristics and that this information should be clearly presented in the LVIA.	This has been noted. A full baseline is presented in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050] and ES Volume 3, Appendix 10.2: Baseline Landscape Character Appraisal [EN010149/APP/6.3] [APP-108] .	Agreed
16-4	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Assessment of effects	At statutory consultation, NKDC noted that the Proposed Development would lead to significant adverse effects on landscape character and visual amenity at all phases of the Proposed Development and had the potential to transform the local landscape and its character on a large-scale, with the potential to affect the wider landscape	The design of the Proposed Development has been developed to respond to the distinctive and unique local character of the Site, informed by relevant local studies such as the North Kesteven Landscape Character Assessment. This is set out in the Design Approach Document [EN010149/APP/7.3.2] and is one of the Project Principles (Principle 2.2) which has been used to guide the design.	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>character by replacing large areas of agricultural/rural land with solar development, which would affect the current open agricultural character.</p> <p>Awaiting Deadline 1 (DL1) responses</p>	<p>Effects on landscape character and visual amenity are assessed in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050]. Table 10.3 of this chapter, acknowledges that there would be some significant adverse effects on landscape and visual amenity during all phases of the Proposed Development but also reports that for many receptors the effects would reduce over the operational lifetime of the development as a result of the maturation of mitigation planting. The geographical extent and duration of adverse significant effects is set out in the chapter.</p>	
16-5	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Landscape character areas	<p>At statutory consultation, NKDC noted that the size of a character area should not be a determining factor in assessing effects, and caution should be applied in regard to larger LCAs, which can be assessed as having a limited magnitude of change as the Proposed Development would only affect a small percentage of the overall larger character area.</p> <p>NKDC request that the LVIA includes a finer-grained local character assessment which identifies individual elements or features of LCAs to form part of the baseline within the site boundary (LCA 7 and LCA 11) and</p>	<p>An assessment of landscape effects is presented in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050]. Whilst the effects are reported with reference to LCAs, the size of the LCA is not a factor in determining the significance of the effect. The extent of significant effects on landscape character are defined with reference to physical features in the landscape and not the LCA as a whole.</p> <p>ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050] provides a finer grain of description of landscape character.</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			assesses the change in that part of the LCA resulting from the Proposed Development.		
			Awaiting DL1 responses		
16-6	S42 Consultation response to 2024 Consultation	RVAA	<p>NKDC expressed concern about the degree to which certain properties or zones might have limited visual relief from the Proposed Development even with amendments to the zonal masterplan and buffers adopted, noting that there are a number of properties less than 200m from proposed areas for solar development.</p> <p>Reference to design mitigation measures applied to the Heckington Fen NSIP including an average buffer of 240-70m and TGN 02/19 guidance which gives an outer range of 250m albeit for road and housing projects.</p> <p>Awaiting DL1 responses</p>	<p>The impact of the Proposed Development on residential visual amenity has been assessed for individual properties in ES Volume 3, Appendix 10.5: Residential Visual Amenity Assessment [EN010149/APP/6.3] [APP-111]. The Applicant considers that appropriate buffers have been proposed around these residential properties such that the Proposed Development would not have an overbearing impact on views.</p> <p>Each property has been considered on an individual basis and buffers/mitigation have been proposed that are specifically tailored to the individual circumstances of the property. Meaningful comparisons cannot be drawn to another project.</p>	Under Discussion
16-7	S42 Consultation response to 2024 Consultation	Screening	<p>NKDC raised concerns that screening along footpaths need to be considered, including that hedgerows could be overbearing if maintained at 3.5m and that concerns set out in NPS</p>	<p>The effect of mitigation planting on existing views has been taken into account in the LVIA presented in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050]. The approach to</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
	and Subsequent Correspondence		EN-3 that screening could impact on ability of users to appreciate the surrounding landscape. Awaiting DL1 responses	<p>mitigation alongside PRow is set out in the Design Approach Document [EN010149/APP/7.3.2].</p> <p>Perimeter fencing surrounding the Solar PV development would be offset by at least 15m from either side of existing and proposed PRow. Even allowing for growth, any hedgerows adjacent to perimeter fencing would maintain a wide pedestrian corridor, enabling the continued ability to enjoy the route even where views from it would be altered. The LVIA presented in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050] acknowledges that in some locations new planting would foreshorten existing views but the alternative would be views of the new infrastructure which would have the same effect in any case.</p> <p>Feedback from Phase Two Consultation indicated a strong preference for hedgerow planting. The green infrastructure proposed would complement existing vegetation in the landscape and in all areas of the development, there would remain regular gaps between fields containing development.</p>	Under Discussion
16-8	S42 Consultation response to 2024 Consultation	Springwell West	At statutory consultation, NKDC noted impacts in Springwell West of particular concern with the Proposed Development (including larger elements such as the substation and cumulative effects from the proposed	<p>An assessment of landscape and visual effects is presented in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050]. This assesses amongst other things the effects on views from the A15. The approach to mitigating visual effects from the A15 is</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
	and Subsequent Correspondence		<p>National Grid Navenby Substation) currently shown in close proximity to visual receptors (particularly the A15) within an open landscape.</p> <p>NKDC was concerned that mitigation planting may foreshorten views, which would be a conspicuous change to the baseline and the mitigation solution along the A15 needs to be fully considered, with a balance struck between screening and integration.</p> <p>Awaiting DL1 responses</p>	<p>outlined in the Design Approach Document [EN010149/APP/7.3.2].</p> <p>Following Phase Two Consultation, the proposed siting zone for the BESS and Springwell Substation was drawn back from the A15 such that the Proposed Development now incorporates a 250m buffer from the A15. This would maintain a sense of openness along the road and limit the effect on long distance views.</p> <p>In Springwell West, tree belt planting is proposed to extend and connect with existing blocks of woodland such as Bloxholm Wood and Gorse Hill Covert. The precedent for new hedgerow planting on either side of the A15 is evident along sections of the A15 to the north and south of the Order Limits. Feedback from Phase Two Consultation expressed a preference for hedgerow planting along the A15.</p>	Under discussion
16-9	Relevant Representation	ES Chapter 10: Landscape and Visual	<p>NKDC is concerned about the landscape character effects through changes to the land use over an extensive area of land. Significant landscape effects are subsequently identified within the LVIA chapter.</p> <p>The examination process provides the opportunity to review and interrogate the Significant Beneficial effects</p>	<p>An assessment of effects on landscape character is presented in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050]. This chapter acknowledges that some significant effects on landscape character would occur and defines the geographical extent of the landscape over which such effects would occur.</p> <p>The chapter reports that there would be a moderate beneficial effect on landscape fabric (woodland, trees and hedgerows) over the operation lifetime of the Proposed</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>identified on the existing vegetation structure of the landscape (trees and hedgerows) within the Site by year 10 as the scale and extent of development would also lead to Significant Adverse effects on views from visual receptors.</p> <p>Significant changes to views during construction and early operation, especially for users along PRow and the A15, where screening is insufficient.</p> <p>Awaiting DL1 responses</p>	<p>Development and at decommissioning. The Chapter also acknowledges however, that there would be residual adverse effects on visual amenity following the establishment of mitigation planting.</p> <p>ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050] acknowledges that there would be significant visual effects on users of the A15 although mitigation measures (earthworks and mitigation planting would reduce the magnitude of effect over the operational lifetime of the Proposed Development.</p> <p>The design strategy for mitigating visual effects on users of the A15 is outlined in the Design Approach Document [EN010149/APP/7.3.2]</p> <p>A wider buffer of 250m has been applied to the area where the Springwell Substation and BESS are proposed to be located and new hedgerows are proposed along the road verges for much of the A15 as it passes through the Order Limits.</p>	Under Discussion
16-10	Relevant Representation and Subsequent Correspondence	National Grid Navenby Substation	<p>NKDC notes that the NGNS is identified as the primary project to potentially general cumulative landscape or visual effects with the Proposed Development.</p>	<p>The Applicant has noted the suggestion of additional hedgerow planting within the Springwell Order Limits to mitigate the cumulative landscape and visual effects with the proposed National Grid Navenby Substation.</p> <p>As of April 2025, National Grid has not yet submitted an application for the proposed Navenby Substation and</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>NKDC discusses how there are potential opportunities for the applicants of both projects to coordinate mitigation planting in the area around the National Grid Substation, which is requested to be investigated further by the Council.</p> <p>Awaiting DL1 responses</p>	<p>therefore details of the expected application are not available.</p> <p>The Applicant will continue dialogue with National Grid and once details of the proposed Navenby Substation are available will review any opportunities to provide additional mitigation of any cumulative landscape and visual effects.</p>	
16-11	Relevant Representation and Subsequent Correspondence	Draft DCO	<p>The DCO should include approval for detailed landscape and ecological mitigation schemes and an appropriate period of landscape maintenance (10-15 years) to align with assessed residual effects.</p> <p>NKDC note that BNG provision has not been fully agreed i.e. the LEMP will include provisions around BNG.</p>	<p>The Proposed Development includes extensive proposals for new planting as shown by the Green Infrastructure Parameters presented in Appendix 1 of the oLEMP [EN010149/APP/7.9.2]. This includes approximately 16ha of new tree belts, 15,563m of new hedgerow planting and 100ha of open grassland to mitigate the Proposed Development.</p> <p>The ES sets out assumptions on the successful establishment and growth rates of new planting for the purposes of assessment. The assumed growth rates of newly planted hedgerows and trees is detailed in Section 10 of the ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050]. At Year 10, it assumes that hedgerows will be a height of 3.5m (fully mature) and woodland and scrub will be a height of 4m. For other proposed habitats types, target conditions and assessment criteria are set out in ES Volume 3,</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>Appendix 7.14 Biodiversity Net Gain Assessment [EN010149/APP/6.3.2].</p> <p>The oLEMP [EN10149/APP/7.9.2] provides a framework for delivering the Green Infrastructure elements of the Proposed Development for the construction and operational phases. It includes management and monitoring prescriptions to ensure the successful establishment of new planting. Section 7 of the oLEMP provides information on the monitoring and states that all habitats being created and enhanced for the delivery of biodiversity net gain will be monitored in years 1, 2, 3 and 5, 10 and 15 (and beyond) against the BNG Metric target and habitat types and condition. 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).</p> <p>Should the DCO be granted consent, detailed LEMP(s) will be produced for the Proposed development as secured by Schedule 2 of the Draft DCO</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
16-12	Relevant Representation and Subsequent Correspondence	Vegetation removal processes	Clear vegetation removal processes should be put in place to ensure any vegetation loss is aligned with these plans and schedules and further removal or works is agreed with the relevant parties prior to any works being carried out. Awaiting DL1 responses	[EN010149/APP/3.1.2] and must be substantially in accordance with the oLEMP [EN10149/APP/7.9.2].	
				Vegetation removal would be limited to that essential for the construction and operation of the Proposed Development. The vegetation removal parameters are outlined and secured within the oLEMP [EN10149/APP/7.9.2]. The vegetation removal will be undertaken in accordance with the Landscape and Ecology Management Plan.	Under discussion

Table 17 – Land, Soil and Groundwater

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
17-1	S42 Consultation response to 2024 Consultation	Alternatives	NKDC note that the ES should set out under the consideration of 'alternatives' the reasons for areas of Grades 2 and 3a land being proposed for development and why areas classed as Grades 3b and 4, for example C7, Md04 and Md05 remain outside the proposed panelled areas.	<p>The Applicant's approach to design is set out in the Design Approach Document [EN010149/APP/7.3.2]. This includes Project Principles which have been applied to limit the use of BMV. It is important to recognise that there is often more than one constraint present when considering appropriate locations for various uses within the Proposed Development and that BMV, while important, is not the determining factor.</p> <p>The NPS EN-3 states that the use of lower-grade agricultural land is preferred to the use of BMV, with the position in EN-3 being that applicants should seek to utilise, where possible, "suitable previously developed land, brownfield land, contaminated and industrial land".</p> <p>The significant caveat is that paragraph 2.10.29 of EN-3 states that "land type should not be a predominating factor in determining the suitability of the site location". A Site Selection Report has also been prepared. It is included in Appendix 1 to the Planning Statement [EN010149/APP/7.2.2] [AS-018]. It explains the Applicant's approach to the selection of an appropriate site to take forward as part of an application for an NSIP scale solar project. The report explains that initially, there are three fundamental attributes required to develop NSIP</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>scale solar: suitable irradiance and topography, a connection to the National Grid, and available land.</p> <p>The Applicant's understanding of the land in and around the Order Limits was supplemented by initial conversations with Blankney Estate regarding the quality and viability of the Order Limits for agriculture. This understanding helped direct the availability of the land within the landholding and subsequent site selection at a micro level during design development. The information which has been provided to the Applicant sets out yield data across the Order Limits on a field-by-field basis from the last 13 years, as well as the landowner's own consideration of the productivity of individual parcels and its preference for continued agricultural use, whilst acknowledging that there would be a balancing of continued use for farming purposes versus the need to deliver a commercially viable project.</p> <p>At a site design level, the Applicant has sought to, where possible, reduce the use of BMV land within the Proposed Development. However, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire it has not been possible to avoid it entirely.</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>The Applicant has sought to reduce the amount of BMV used for Solar PV and other built elements of the Proposed Development. Out of the 1280ha of land within the Order Limits, 541.2ha is classed as BMV (42.3%). Of this, 231.7ha (42.8%) is proposed to be used for built elements of the Proposed Development i.e., collector compounds, Springwell Substation, Solar PV development and BESS. With specific reference to areas proposed for Solar PV development, 35.6% of BMV land within the Order Limits is proposed to be used for Solar PV development.</p> <p>While recognising the amount of BMV included which would remain free from development, it has not been possible to remove all BMV land from the Order Limits. To do so would reduce renewable energy generation capability in a location where there is available grid capacity, and at a time when the need for such development is urgent. This is a critical point and is consistent with Paragraph 2.10.30 of EN-3 which explains that solar farm developments are not prohibited on 'best and most versatile' agricultural land and that "it is recognised that at this scale, it is likely that applicants' developments may use some agricultural land". This point</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>is further demonstrated by the limited availability of poorer grade land in the areas surrounding the Site.</p> <p>It is also important to recognise that BMV is one of several factors which influence the way design develops in the same way it is one of several criteria used in site selection. As set out earlier in this section the NPS EN-3 is very clear that land type should not be a predominating factor in site selection. The Applicant considers this is relevant in both the site selection and design development process. Neither EN-1 nor EN-3 place a higher policy emphasis on the use of agricultural land in comparison to other environmental considerations but require the Applicant to justify its use.</p> <p>The other critical factor in the consideration of impacts on BMV is the degree of impact which it is deemed to have. The Draft DCO [EN010149/APP/3.1.2] would include a requirement that each phase of the Proposed Development must be decommissioned after 40 years of operation, after which time all hard infrastructure above ground and below ground to a depth of 1metre, with the exception of cabling, would be removed from the land (as secured within the oDEMP [EN010149/APP/7.13.2]).</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
17-2	S42 Consultation response to 2024 Consultation	Approach to assessment	<p>NKDC are in disagreement that the impact magnitude should be based on permanent loss of one or more soil functions or soil volumes as this does not account for loss of agricultural/ food production over the lifetime of the Proposed Development.</p> <p>Recommendation that assessment of loss should include both permanent and temporary losses in line with the Central Lincolnshire Local Plan.</p>	<p>The Applicant has considered the impacts to soil and BMV in line with industry guidelines (Institute of Environmental Management & Assessment (IEMA) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment (2022)) and has presented justification for the methodology in the Scoping Report and within ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]. Policy S14 of the Central Lincolnshire Local Plan has been taken into consideration, and careful positioning of elements of the Proposed Development has been a part of the design process, to minimise impacts on higher quality (BMV) agricultural land.</p> <p>ES Volume 1, Chapter 11 Land, Soil and Groundwater [EN010149/APP/6.1.2] covers both temporary and permanent land use (Section 11.9.16), and it should be noted that the only land considered to be undergoing a permanent land use change would be the land used for green infrastructure, which has been considered as permanent for the purposes of this assessment. This permanent land take for green infrastructure affects a total area of 166.2ha, of which 77ha are classified as BMV land. This land would not be occupied by permanent hardstanding, buildings or other infrastructure associated with the Proposed Development, but would comprise landscaped areas that are to be incorporated into the Proposed Development in order to provide beneficial</p>	Not Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>attributes in terms of biodiversity mitigation and enhancement. Therefore, although this area of permanent green infrastructure does result in the lack of availability of a small proportion of agricultural land (and a smaller area of BMV land), this is considered to be offset by the positive impacts associated with the provision of biodiversity mitigation and enhancement areas.</p> <p>The Draft DCO [EN010149/APP/3.1.2] includes a requirement that each phase of the Proposed Development must be decommissioned after 40 years of operation, after which time all hard infrastructure above ground and below ground to a depth of 1 metre, with the exception of cabling, would be removed from the land (as secured within the oDEMP [EN010149/APP/7.13.2]).</p> <p>Decommissioning would include removing any permissive paths and the land would be returned to the landowner. Landscape structural planting, including tree planting, hedgerows, scrub created to deliver biodiversity mitigation and enhancement associated with the Proposed Development would be left in situ when the Site is handed back to landowners, except for the planting within Tb2, which would be removed to facilitate the releveling and removal of the earth bund to allow the field to be returned to agricultural use. Otherwise, it is assumed that the</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>landowner would return the land to agricultural use when it is handed back.</p> <p>It would not be possible to advance with this project without the use of some BMV land, and the Applicant has provided further justification for this, as referenced in Section 11.9 of ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2] and within the Planning Statement [EN010149/APP/7.2.2] [AS-018].</p> <p>Food security is not an issue which is raised within the suite of Energy NPPs, the NPPF or Local Development Plan policies, though it is recognised to be a source of national debate and has been raised in response to consultation. It is, however, referred to in the 2024 Written Ministerial Statement which sets out that food security is an important part of our national security. The existing agricultural land use for the Proposed Development is predominantly for growing a wide range of arable crops for human consumption, animal feed and energy production. Given the absence of any specific policy requirement no further consideration of this matter is provided.</p>	
17-3	S42 Consultation response to 2024 Consultation	Approach to assessment	NKDC note that the Applicant has placed great weight on effects being 'temporary' (and that permanent 'sealing over' is limited).	The term 'sealing over' is taken to relate to areas where there would be a permanent use of land for non-agricultural uses. For the Proposed Development, the only land to be permanently changed in terms of land use is the area where permanent landscape planting (green	Not Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
	and Subsequent Correspondence		See NKDC LIR/WR. Awaiting response on ExQ1 regards 'sealing over' question.	<p>infrastructure) is proposed. There are no locations where permanent hardstanding would be located, as all above-ground infrastructure would be removed on decommissioning (including buildings and hardstanding associated with substations, etc).</p> <p>The Applicant has approached the assessment of effects in line with industry guidance for land and soils (IEMA Guide: A New Perspective on Land and Soil in Environmental Impact Assessment (2022)), which sets out guidelines for determining the magnitude of the impact. The project parameters (ES Volume 3, Appendix 3.1: Project Parameters [EN010149/APP/6.3] [APP-074]) indicate a 40-year lifetime per phase for all areas of the Proposed Development (except permanent landscaping), and these are the factors that have been used in completing the land, soil and groundwater assessment, as detailed in ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2].</p> <p>The permanent land take as a result of structural planting is shown on the Green Infrastructure Parameters presented in Appendix 1 of the oLEMP [EN010149/APP/7.9.2] and equates to 16ha of tree belts and 15,563m of new hedgerow planting. The remainder of the proposed green infrastructure, which includes 100ha of calcareous and neutral grassland is considered to be</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				temporary and could be reverted back to agricultural land when the land is returned to the landowner at the end of the decommissioning phase of the Proposed Development. The earthworks bund which is proposed to be located in Field Tb2 adjacent to the A15 is considered to be temporary as at decommissioning the land will be returned to the landowner who have confirmed that it is anticipated that they would want to revert this field back to agricultural use.	
17-4	S42 Consultation response to 2024 Consultation	Approach to assessment	NKDC are in disagreement with the Applicant's conclusion that the overall operational impact on soils and agricultural land, which states that the magnitude of impact is minor and therefore that the significance of effect is considered to be slight or moderate adverse – albeit it is noted that the Applicant concludes that this is 'potentially significant'.	The Applicant has undertaken the assessment in soils in line with the Institute of Environmental Management & Assessment (IEMA) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment (2022), and draws attention to how the assessment approach has changed since Phase Two Consultation, where: Grade 1 and Grade 2 land are regarded as very high sensitivity in terms of the methodology, and therefore this results in a moderate effect, which is considered to be significant in EIA terms (see Section 11.9 in ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2])	Not Agreed
17-5	S42 Consultation response to 2024 Consultation	BMV land	NKDC support for the Applicant's commitment to reduce and remove areas of BMV, but further explanation for why only partial removal of BMV land has been carried out is needed and has not been applied to Grade 3a land.	The Applicant has sought to minimise impacts on BMV land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. This has influenced both the initial site selection process and the subsequent design evolution of the Proposed Development. Fields comprising	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			Query whether the 'majority field removal' approach is based on guidance or is a bespoke position.	<p>of solely Grade 1 or 2 land within the Site would remain available for arable production.</p> <p>The Applicant notes that Grade 3a land is also classified as BMV land, however, given the large areas of Grade 3a land within the area being considered for the Proposed Development, it would not be a viable scheme on smaller land parcels, or without the use of some BMV land. By using Grade 3a land in preference to Grade 1 or Grade 2 land, the Applicant has attempted to reduce impacts to very high sensitivity soils.</p> <p>The Applicant provides a detailed consideration of the construction methodology, and the methods by which soil will be managed to ensure that the quality after construction, or after decommissioning, will be the same or improved from the current soil quality, as given in ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2] and detailed in the Outline Soil Management Plan [EN010149/APP/7.11.2]. The quality of the soil will not be adversely affected by the Proposed Development (and may undergo an improvement due to a period of not being used for agricultural purposes). At a site design level, the Applicant has sought to, where possible, reduce the use of BMV land, however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>Lincolnshire it has not been possible to avoid it entirely. The steps which the Applicant has taken therefore to avoid, reduce and subsequently mitigate impacts on BMV are explained below. The Design Approach Document [EN010149/APP/7.3.2] sets out Project Principles which have framed the development of the design of the Proposed Development to date.</p> <ul style="list-style-type: none"> - Principle 8.1 All fields comprising solely of Grade 1 or 2 land within the site will remain available for arable production. - Principle 8.2 Prioritise the use of BMV land for arable production where practicable. - Principle 8.3 Prioritise the use of non-BMV land for habitat creation where practicable. <p>Section 6 of the Design Approach Document explains in greater detail how design measures were incorporated, and changes were made during design development in relation to each of the Project Principles. It explains that the Applicant discounted all fields comprising solely Grade 1 or Grade 2 agricultural land from the proposed built development. Fields By18 (Grade 2) and By27 (Majority Grade 1 approximately 25% Grade 2) are retained in the Order Limits and remain available for arable production and are included primarily to allow for underground cable routes and/or use of existing access tracks as indicated on the Works Plans [EN010149/APP/2.3] [APP-007].</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
17-6	S42 Consultation response to 2024 Consultation	BMV land	NKDC request for confirmation that where BMV land is being prioritised for agricultural production within the Proposed Development, whether this includes Grade 3a land, and whether areas would remain within the site boundary. Comment that the draft DCO should specify how this could be delivered.	Land intended to be retained for agricultural production within the Order Limits includes Grade 1, 2, 3a and 3b land is included for the purposes of the temporary installation of the cabling as shown on the ES Volume 2, Figure 3.1: Zonal Masterplan [EN010149/APP/6.2.2] and following construction will be remain as arable use.	Under Discussion
17-7	S42 Consultation response to 2024 Consultation	BMV land	NKDC note that information should be presented on points/proportions of BMV avoidance that would result in the Proposed Development not being viable to justify use of BMV.	<p>Details are provided in ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2] to cover the use of BMV and non-BMV land within the Order Limits. A specific assessment of what level of balance would result in the Proposed Development being viable/not viable has not been undertaken. However, the Applicant believes sufficient details have been provided to demonstrate the viability of the Proposed Development with the current project parameters (ES Volume 3, Appendix 3.1: Project Parameters [EN010149/APP/6.3] [APP-074]).</p> <p>At a site design level, the Applicant has sought to, where possible, reduce the use of BMV land; however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in Lincolnshire, it has not been possible to avoid it entirely. The steps which the Applicant has taken, therefore, to avoid, reduce and subsequently mitigate impacts on BMV,</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>as explained in the Planning Statement [EN010149/APP/7.2.2] [AS-018].</p> <p>The Proposed Development's impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a) with the proportion of BMV in Lincolnshire rising to 71.2%, which is significantly above the national average. Therefore, in the context of the county, BMV land is abundant.</p> <p>The 'county scale' BMV soil maps available are the Provisional ALC maps, which do not differentiate between Grade 3a and Grade 3b. Therefore, accurately estimating the BMV for Lincolnshire is difficult. As such, a review of the available maps and the other cumulative solar DCOs progressing within Lincolnshire has been undertaken to provide a consistent number against which to assess; some refer to total agricultural land (e.g. Heckington Fen Solar Park), whilst others provide an estimate of BMV from the mapping available (e.g. Beacon Fen Energy Park).</p> <p>The area of BMV agricultural land within Lincolnshire is, therefore, estimated to be over 410,000ha. In this context,</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
17-8	S42 Consultation response to 2024 Consultation	Construction	NKDC note that there is potential for damage and deterioration of high-quality soils through construction activities, including through vehicle movements. Comments that it is possible that this could cause long-term drainage issues on site.	<p>the Proposed Development occupies approximately 0.13% of the BMV land in Lincolnshire, of which 0.002% is assessed as being permanently used as green infrastructure.</p> <p>The potential for damage to soils as a result of construction activities and vehicle movements is included in the assessment undertaken in ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]. There are significant numbers of measures that are defined in the Outline Construction Environmental Management Plan [EN010149/APP/7.8.2] and Outline Soil Management Plan [EN010149/APP/7.11.2] which will ensure that soil quality and soil structure are protected during all phases of the Proposed Development. These include stripping of topsoil where appropriate, with storage in managed stockpiles for the required timescale, followed by managed reinstatement to preserve soil. The potential for damage to existing drainage regimes is also considered in ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2], and the measures required to be followed by the management plans referenced above will also prevent damage to existing field drainage and prevent compaction of soils (minimising potential subsequent impacts on land drainage).</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
17-9	S42 Consultation response to 2024 Consultation	Mitigation	NKDC note that there are significant concerns that mitigation proposals for the development of 43% BMV land across the site are poorly developed and have not been adequately justified. NKDC request for further engagement on this matter prior to DCO submission.	<p>The Applicant has sought to minimise impacts on BMV land and preferably use land in areas of poorer quality. This has influenced both the initial site selection process and the subsequent design of the Proposed Development. Fields comprising of solely Grade 1 or 2 land within the Site would remain available for arable production. Section 8 of the Planning Statement [EN010149/APP/7.2.2] [AS-018] sets out the Applicant's justification for use of BMV land.</p> <p>Further engagement has been undertaken with NKDC to discuss the ALC survey results and design development and principles which have prioritised the use of non-BMV land where practicable. Further detail on engagement is set out within ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2].</p>	Under Discussion
17-10	Relevant Representation	Soil management and Restoration	NKDC notes that suitable soil management and restoration clauses should be included in order to secure the land quality at the end of the term. Noting that if the soil is in substandard condition during the operation of the solar farm, carbon sequestration is reduced and infiltration of water can also be reduced, leading to localised standing water and the reduction in soil quality.	The Applicant has submitted an Outline Soil Management Plan [EN010149/APP/7.11.2] with the DCO application. This management plan sets out all of the clauses for management and restoration of the soil during the construction, operation and decommissioning phases.	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
17-11	Relevant Representation	Re-instatement Plan	NKDC have requested for a suitable record of condition and re-instatement plan to be provided due to the temporary disturbance of the soils to enable a trench to be dug and cabling to be inserted.	The Applicant has submitted an Outline Soil Management Plan [EN010149/APP/7.11.2] with the DCO application. This management plan sets out all of the clauses for management and restoration of the soil during the construction, operation and decommissioning phases.	Under Discussion
17-12	Relevant Representation	Grazing	NKDC notes that the applicant intends to create conditions suitable for grazing in the open spaces between the infrastructure and the land beneath the solar PV modules for pastoral farming (sheep grazing) during the operation phase; the applicant will not be responsible for making arrangements for grazing.	<p>The Applicant is proposing for the area beneath the Solar PV development to be converted from arable land to grassland managed through a combination of sheep grazing and/or hay/silage production to maintain the field vegetation during the operational phase of the Proposed Development. Further detail on the operational management is detailed and secured within the Outline Landscape and Ecology Management Plan[EN010149/APP/7.9.2] which will be discussed at a detailed stage with the relevant local planning authorities</p> <p>Should sheep grazing be undertaken this will be undertaken taking into consideration the BRE <i>Agricultural Good Practice Guidance for Solar Farms</i> (2014).</p>	Under Discussion

Table 18 – Noise and Vibration

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
18-1	S42 Consultation response to 2024 Consultation	Approach to assessment	NKDC note that further work should be completed to assess for negative impacts from construction and decommissioning works with modelling and mitigation technologies agreed with host authorities.	<p>The construction and decommissioning noise impacts, as discussed within ES Volume 1, Chapter 12: Noise and Vibration [EN010149/APP/6.1] [APP-052], conclude that the impacts are considered not significant.</p> <p>Through the implementation of the oCEMP [EN010149/APP/7.7.2], oDEMP [EN010149/APP/7.13.2], and Best Practicable Means (BPM) as defined by the Control of Pollution Act 1974, the noise impacts at receptors in the vicinity of the construction and decommissioning phase activities would be minimised.</p> <p>Should proposed construction methods change, which would increase those levels presented within the noise and vibration chapter, then re-assessment would be undertaken and discussion had with the host authorities.</p>	Agreed
18-2	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Approach to assessment	<p>NKDC note that a sensitivity has not been assigned to users of PRowWs.</p> <p>Defer to LCC</p>	<p>Sensitivity has not been assigned to users of PRow in the same manner as those 'fixed' receptors due to the transient use of PRow in comparison to those property receptors utilised in the study area.</p> <p>There is no guidance or standards which identifies PRow (or their users) as noise sensitive. It is anticipated that the sensitivity of any user would be low and that their exposure to noise would be temporary and transient as they move through the area.</p>	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>Whilst construction noise would be evident and occasionally noticeable for users of the PRow, the anticipated levels would not result in prolonged impact along an individual route, and the transitory nature of the construction works (and users of the PRow) will ensure no single PRow is consistently exposed to construction noise for an extended period. Furthermore, it is unlikely that users will experience levels of construction related noise for prolonged periods that will be above the level of the residual noise environment.</p>	
18-3	S42 Consultation response to 2024 Consultation	BESS location	NKDC request that flexibility on the location of the BESS is retained, and the BESS position (and associated noise impact assessment) is not fixed given concern about LVIA implications of locating the BESS in Springwell West.	<p>The Applicant is proposing to locate the BESS within Field Tb2. The exact layout of the BESS within Tb2 would be determined as part of the detailed design stage, should the Application be granted consent. This would take into account environmental factors which are presented in the Environmental Statement [APP-040 - 134]. More detail is available in ES Volume 1, Chapter 12: Noise and Vibration [EN010149/APP/6.1] [APP-052] and ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050].</p>	Agreed

Table 19 – Operation

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
19-1	S42 Consultation response to 2024 Consultation	Maintenance activity	NKDC note that the impact of maintenance activities during operation should be assessed, stating within the DCO any allowances or flexibility sought to enable maintenance and component replacements to be carried out, mindful that the Applicant may wish to upgrade panels to reflect latest technologies and designs during operation.	During the operational (including maintenance) phase of the Proposed Development, on-site activities would include routine servicing, maintenance, and replacement of solar or BESS equipment as and when required, as well as solar panel cleaning and vegetation management. The Applicant's proposed approach to the long-term management of the Proposed Development during operation is further set out in the Outline Operational Environmental Management Plan [EN010149/APP/7.10.2] and ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2] .	Under Discussion

Table 20 - Population

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
20-1	S42 Consultation response to 2024 Consultation	Employment	<p>NKDC note that information on the number of agricultural jobs lost and total net employment should be developed as part of the DCO Application.</p> <p>Other comments state that the loss of agricultural operations should be assessed in light of changes to the NPPF with regard to food production.</p>	<p>An assessment of employment including agricultural jobs and agricultural land holdings is addressed within ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2].</p> <p>This concludes that the temporary loss of agricultural land represents approximately 0.3% of agricultural land in Lincolnshire, with an indicative capacity for around 30 FTE jobs based on average employment density.</p> <p>There are two agricultural operations within the study area. During the construction phase, it is expected that both operations will lose access to a portion of the land normally available. The operators of agricultural activities within the Site anticipate that the reduction in operating capacity would be met entirely through retirement and a pause on recruitment, resulting in net loss of employment supported, but no redundancy.</p> <p>ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.2] assesses cumulative impacts of the loss of best and most versatile agricultural land in Lincolnshire. It is concluded that the cumulative impact on agricultural land is minimal and not significant. Appendix 3 of the Planning Statement [EN010149/APP/7.2.2] [AS-018] sets out the Applicant's response to relevant policy, including draft amendments to the NPPF (2024).</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
20-2	Relevant Representation and Subsequent Correspondence	Skills and Education Package	<p>Consistent with its approach at Heckington Fen solar park (Ref: EN010123) the Council will be seeking commitments to delivering a Skills and Education package via a s106 Agreement which should engage a financial contribution.</p> <p>See NKDC response to ExQ1</p>	<p>An Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20] [APP- 0153] supports the DCO Application. The overarching aim of the Plan is to help maximise positive gain for the local economy from the beneficial effects arising from employment generation and supply chain opportunities during the construction and operational phases.</p> <p>The Outline Plan details commitments to work with partners and the local and regional construction supply chain to open up opportunities for jobs and skills development for communities and for companies with relevant experience and competencies to engage with the supply chain.</p> <p>The objectives of the Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20] [APP-0153] are detailed below:</p> <ul style="list-style-type: none"> • Promote opportunities for people who are employed, unemployed and economically active and young people who are Not in Education, Employment or Training (NEET) to access employment and skills development opportunities; • Create opportunities for businesses to tender for work and join the supply chain of the Proposed Development; • Clearly define the workforce, skills and supply chain requirements of the Proposed Development and articulate these in a clear and timely way to regional stakeholders involved in supporting education, access to employment, skills development and business engagement; 	Under discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<ul style="list-style-type: none"> • Harness the motivational potential of the Proposed Development to inspire the next generation of talent, particularly, to confidently invest in a career and future in Lincolnshire, benefitting all employers; • Contribute to a Regional evidence base to support the planning and delivery of education and skills curricula and training capable of delivering the workforce and skills needed across the Region, at the right time, to support the business competitiveness of all energy and construction projects. Mechanisms for how these objectives can be achieved are being considered and may be delivered through the applicant, main construction organisation or a third party organisation. <p>Delivery will be supported by an Education and Skills Fund. £50,000 will be payable on an annual basis, up to a sum not exceeding £2,000,000. The first instalment will be payable on commencement of the main construction contract (s). Further instalments of £50,000 will be made on the anniversary of commencement. The Outline Plan sets out a framework whereby people may be able to up/re-skill, if required, to contribute to the workforce required by the Proposed Development as well as support their own career development generally. Actions proposed would also contribute to strategic policy objectives to improve the skills base and supply chain in green construction. This will aid in addressing future cumulative demand for similar skills across the Region's renewable energy sector and, potentially, increase local and regional supply chain capacity.</p>	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				The Applicant has engaged with North Kesteven District Council on the content and approach to the Outline Plan and will continue to engage on the development of future iterations.	

Table 21 – Public Rights of Way and Permissive Footpaths

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
21-1	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Approach to assessment	<p>NKDC note that the ES will include an assessment of pedestrian amenity taking into account any diversions that may increase journey times.</p> <p>Defer to LCC</p>	<p>An assessment of pedestrian amenity is presented in ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2] [AS-010]. This includes assessment of temporary diversions to limit increases to journey times.</p> <p>The Applicant has produced an Outline Public Rights of Way and Permissive Paths Management Plan [EN010149/APP/7.12.2] which sets out how the Applicant is proposing to manage PRoW and permissive pathways to ensure they are safe and accessible throughout the lifetime of the Proposed Development. Any diversion requirements would be outlined at detailed design.</p>	Under Discussion
21-2	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Enhancement	<p>NKDC note that the Applicant should investigate how it can deliver or accommodate elements of the Scopwick/ Kirkby Green to Metheringham Railway Station Community Project detailed in Appendix A of the Scopwick and Kirkby Green Neighbourhood Plan.</p> <p>Defer to LCC</p>	<p>The Applicant has considered relevant policies within Appendix A of the Scopwick and Kirkby Green Neighbourhood Plan as part of the design of the Proposed Development.</p> <p>In line with the objectives in the Scopwick and Kirkby Green Neighbourhood Plan, the Proposed Development would include a permanent upgrade to the existing PRoW between Scopwick and Blankney (Spires and Steeples Trail) to bridleway status (approx. length 2,090m) as secured by Design Commitments [EN010149/APP/7.4] [APP-0138]. These proposed upgrades include sections of the proposed route(s) detailed in Appendix A of the Scopwick and Kirkby Green Neighbourhood Plan.</p> <p>This is outlined in ES Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2].</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
21-3	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Springwell Central	<p>NKDC recommend that new walking routes within Springwell Central, delivered as part of the Proposed Development include:</p> <ul style="list-style-type: none"> • Complete missing section of Rows/5/1 onto B1191 • Extension of Rowston PF 5 to connect to road • Consider new section of permissive path from edge of RAF Digby to connect into Scop/12/1 at field BcD066 (behind hedge line) with verge improvement and possible TRO 30mph speed limit change. <p>Defer to LCC</p>	<p>Where possible and practicable, the Applicant has sought to include the suggestions within the proposals.</p> <p>With specific reference to the suggested routes:</p> <ul style="list-style-type: none"> - Complete missing section of Rows/5/1 onto B1191, extension of Rowston PF 5 to connect to road: The existing missing section is informally along a track serving water utility infrastructure. Due to vehicle access and parties rights over the track (including MoD), and there being insufficient space on the track it is not possible to segregate vehicles and a PRoW. The Applicant does not plan to use the access track or carry out any works to it. The informal use of the track is considered to remain adequate. - Consider new section of permissive path from edge of RAF Digby to connect into Scop/12/1 at field BcD066 (behind hedge line) with verge improvement and possible TRO 30mph speed limit change: A new PRoW is proposed to link RAF Digby to Scopwick (approx. length 1,670m) behind the existing hedgerow, connecting to the existing footpath at Scopwick and 30mph zone with a speed limit reduction extension included within the DCO. 	Under Discussion
21-4	S42 Consultation response to 2024 Consultation	Springwell West	<p>NKDC recommend that new walking routes within Springwell West delivered as part of the Proposed Development include:</p>	<p>Where possible and practicable, the Applicant has sought to include the suggestions within the proposals.</p> <p>With specific reference to the suggested routes:</p>	Under Discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
	and Subsequent Correspondence		<ul style="list-style-type: none"> • Realignment of Temp/2/1 onto Gorse Lane • NKDC suggest that Ashby de la Lande PF/4 should be diverted and the potential historic continuation extinguished. • Diversion of Ashby de la Launde PF/2 <ul style="list-style-type: none"> • Complete missing section of AshL/4/1 • Link Brau/5/1 with AshL/11/1 • Consider whether AshL/11/1 can be linked with Brau/8/1 – pending road safety audit on the possible crossing point on A15. • Extension of Ashby de la Launde PF/11 can be linked to B1191 • Create new path along Cuckoo Lane south of RAF Digby 	<ul style="list-style-type: none"> - Realignment of Temp/2/1 onto Gorse Lane: This was not included due to access requirements of the Proposed Development. - Diversion of Ashby de la Lande PF/4 and potential historic continuation extinguished: This was not progressed as alternative provisions have been agreed across the Order Limits. - Diversion of Ashby de la Launde PF/2: Further engagement with LCC Highways and PRow officers confirmed that this was not required. - Complete missing section of AshL/4/1: The Applicant is proposing to create a new PRow connecting the existing PRow (AshL/4/1) west of the A15 (near Navenby Lane) to New England Lane. (approx. length 830m). - Link Brau/5/1 with AshL/11/1: The Applicant is proposing new permissive pathways which would provide increased connectivity to Brauncewell. This includes a new permissive path along the western edge of the Proposed Development linking New England Lane to Temple Road, north of Brauncewell (approx. length 4,130m) and a new permissive path linking Bloxholm Wood to Brauncewell Village (approx. length 1,120m). 	

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>towards New England Lane for the benefit of MOD personnel.</p> <ul style="list-style-type: none"> Continuation of Cuckoo Lane at the eastern end to meet the adopted highway to the east. New route linking Ten Acre Planation and Brauncewell (PF11 and PF6) is considered to be a positive enhancement to the Proposed Development. <p>Defer to LCC</p>	<ul style="list-style-type: none"> Consider whether AshL/11/1 can be linked with Brau/8/1: A new PRoW from Temple Road (north of Brauncewell) to the Bloxholm Woods Car Park to provide a connection across the A15 (approx. length 990m) would link AshL/11/1 and Brau/8/1. This is also considered to address request: Extension of Ashby de la Launde PF/11 can be linked to B1191. Create new path along Cuckoo Lane south of RAF Digby towards New England Lane for the benefit of MOD personnel: This suggestion has not been progressed. Continuation of Cuckoo Lane at the eastern end to meet the adopted highway to the east: This suggestion has not been progressed. New route linking Ten Acre Planation and Brauncewell (PF11 and PF6) is considered to be a positive enhancement to the Proposed Development: This is noted. The Applicant is proposing a number of new permissive pathways to provide better connectivity between Ten Acre Plantation, Bloxholm Wood and Brauncewell Village (approx. length 1,120m). 	

Table 22 – Traffic and Transport

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
22-1	S42 Consultation response to 2024 Consultation	Access points	NKDC note that existing breaks in field boundaries should be utilised for both construction and permanent access to minimise vegetation loss.	Existing breaks in the hedgerows along the highway boundary have been prioritised as locations for site access points. Where not feasible due to the visibility requirements to/from the access, proximity of tree roots or other environmental impacts, alternative locations for accesses are proposed. All access points would be permanent and would be used for maintenance access during operation. Details of the access locations are included in the Outline Construction Traffic Management Plan [EN010149/APP/7.8.2] .	Agreed
22-2	S42 Consultation response to 2024 Consultation	Decommissioning	NKDC note that the ES should present measures for early decommissioning in case of early cessation of energy generation, including future baseline traffic flows that aren't solely based at year 40.	Decommissioning is considered within ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2] [AS-010] , noting that any requirements from a traffic movement perspective would not be greater than those within the construction phase, where future baseline traffic flows are not solely based at year 40. The assessment of decommissioning impacts within ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2] [AS-010] also states that mitigation measures would be similar to that implemented during construction. Baseline traffic data is not provided for decommissioning at this stage as it is too far in the future to reasonably predict those levels, however decommissioning measures are controlled through the oDEMP [EN010149/APP/7.13.2] . Decommissioning must also be in accordance with Requirement 19 of the Draft DCO	Agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
				<p>[EN010149/APP/3.1.2] which requires that decommissioning be no later than 40 years after the date of final commissioning. Any early decommissioning would be expected to require the same measures and mitigation as that for planned decommissioning.</p>	
22-3	S42 Consultation response to 2024 Consultation	Planning policy	NKDC note that the Sleaford Transport Strategy will be relevant in considering construction impacts on the A17 corridor and Holdingham Roundabout area (including cumulative effects).	<p>Elements within the Sleaford Transport Strategy, including the A17 corridor and Holdingham Roundabout have been considered as part of the ES Volume 1 Chapter 16: Cumulative Effects [EN010149/APP/6.1.2] but did not meet the long or short-list of cumulative developments for further consideration presented within ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2] [AS-010] and ES Volume 3, Appendix 14.1: Transport Assessment [EN010149/APP/6.3] [APP-123].</p> <p>The long and short-list of cumulative developments to be considered for cumulative assessment was agreed in liaison with the Local Highways Authority.</p>	Agreed

Table 23 - Water

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
23-1	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Drainage	<p>NKDC note that above ground drainage features should be utilised to be as multi-functional as possible embodying SuDS principles, with design coordinated to exploit opportunities for additional habitat creation as well as surface water retention.</p> <p>NKDC note that BNG provision has not yet been agreed</p>	The Outline Drainage Strategy (which forms an appendix to the Flood Risk Assessment [EN010149/APP/7.16.3]) details that surface water attenuation for the Springwell Substation and BESS areas would likely be provided within basins. Biodiversity would be considered further as part of detailed design of drainage systems, should development consent be granted.	Under Discussion
23-2	S42 Consultation response to 2024 Consultation and Subsequent Correspondence	Flood risk	<p>NKDC note that the NKDC Strategic FRA should be referred to in the preparation of the baseline data in the Flood Risk Assessment and drainage strategy given that parts of the site are shown to be within a combination of flood zones 2 and 3. NKDC request that the FRA incorporates details of the sequential and exception tests which will need to align with the alternatives sites and layouts referred to in the ES.</p> <p>NKDC note that BNG provision has not yet been agreed</p>	The application of the Sequential Test is detailed within the Planning Statement [EN010149/APP/7.2.2] [AS-018] as agreed with North Kesteven District Council and Lincolnshire County Council and the exception test is detailed within the Flood Risk Assessment [EN010149/APP/7.16.3] .	Under Discussion

Table 24 – Draft Development Consent Order and Requirements

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
24-1	Relevant Representation	Requirement on timescales	NKDC notes that they would like to ensure an additional requirement is included in the draft DCO to restrict the commencement of the Springwell solar farm until the proposed NGNS has reached a meaningful point of construction.	<p>Noted. The Applicant considers this is not necessary. As recorded in the Grid Connection Statement [EN010149/APP/7.6.2], the Applicant has a grid connection offer at the proposed Navenby Substation, and the Applicant is aware that National Grid intends to seek planning permission for the substation by way of a Town and Country Planning Act (1990) Application to NKDC.</p> <p>The Applicant is not aware of any obvious reason why the proposed Navenby Substation would not receive planning permission. In terms of the suggestion that the commencement of the Proposed Development should be in some way be restricted based on milestones achieved for the Navenby Substation, there is no justification for this approach. Firstly, the Applicant already has its grid connection offer. Further, the Applicant considers that such a requirement could prevent the Proposed Development from being carried out in a timely and efficient manner, which is not appropriate having regard to the urgent need to deliver renewable energy.</p> <p>Finally, the Applicant's decision to commence construction of the Proposed Development would also be driven by commercial considerations, and it is highly unlikely that the Applicant would construct the Proposed Development without sufficient confidence that a grid connection would be in place for the export of the energy generated.</p>	Not agreed

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
24-2	Relevant Representation and Subsequent Correspondence	Requirement 11	<p>NKDC raise concerns that the wording of proposed Requirement 11 is not suitable as it is vague and unenforceable. Would like to see the wording from the recently approved Mallard Pass and Cottam solar farms is included in this requirement.</p> <p>Defer to LCC</p>	The Applicant has seen the suggested revised wording referred to from the Mallard Pass and Cottam Solar Farms and will engage with NKDC on this requirement 11; however, the Applicant will continue to engage with NKDC to understand the concerns.	Under discussion
24-3	Relevant Representation and Subsequent Correspondence	Articles 40 and 41	<p>NKDC will provide detailed comments on the draft DCO and wishes to participate in an Issue Specific Hearing in relation to the drafting of the DCO. At this stage, NKDC raise concerns around the scope of the authorised development, the wording of the draft requirements, the procedure for the discharge of requirements and the proposed fee schedule. NKDC also raise concerns around the unrestricted powers that would be afforded under Articles 40 and 41 of the draft DCO.</p> <p>See NKDC's response to ExQ1</p>	The Applicant has not seen the suggested revised wording referred to and will engage with NKDC on this Articles 40 and 41; however, the Applicant will continue to engage with NKDC to understand the concerns over the course of the examination.	Under discussion

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
24-4	Relevant Representation and Subsequent Correspondence	Planning Fees – Schedule 16	<p>NKDC notes that there is an increase in planning fees that is due to be introduced in April 2025 and requests that a proportionate increase is reflected in the fees set out in Schedule 16. The Council requests an increase in the number of days available for considering further amendments as the timescale set out in Schedule 16 does not allow sufficient time for consultation.</p> <p>See NKDC's Written Representation</p>	Ongoing engagement between the Applicant and NKDC is required to understand fee amendments and timescales.	Under discussion

Signatures

This Statement of Common Ground is agreed upon:

On behalf of North Kesteven District Council

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date: