Springwell Solar Farm

Draft Statement of Common Ground

Natural England

EN010149/APP/8.4
Version 1
Deadline 1
June 2025
Springwell Energyfarm Ltd

Rule 8 (1)(e)

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 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 Natural England (NE).

1.2.2 NE is an executive non-departmental public body sponsored by the Department for Environment, Food and Rural Affairs (Defra). As a statutory nature conservation body, NE is the Government's advisor on the protection of the natural environment in England. NE's general purposes is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

1.2.3 NE's role in relation to the Development Consent Order (DCO) process derives from the PA 2008 and secondary legislation made under PA 2008. The roles and responsibilities of NE under the PA 2008 fall into the following categories:

a. As one of the prescribed consultees under Section 42 of the PA 2008 that applicants are required to consult before submitting a Nationally Significant Infrastructure Projects (NSIP) application.

b. As one of the consultation bodies that the Planning Inspectorate must consult before a scoping opinion is adopted in relation to any Environmental Impact Assessment (EIA) and as a prescribed consultee for the environmental information submitted pursuant to the Infrastructure Planning (EIA) Regulations 2017[1].

c. As a statutory party in the examination of DCO applications.

[1] The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available online: https://www.legislation.gov.uk/uksi/2017/572/contents/made

d. As a statutory nature conservation body under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations)[2] in respect of the Habitats Regulations Assessment (HRA).

e. As a consenting and licensing body/authority in respect of protected species and operations likely to damage the protected features of Sites of Special Scientific Interest (SSSIs) pursuant to the Wildlife and Countryside Act 1981 (as amended) (WCA 1981)[3] and in relation to European protected species under the Habitats Regulations.

1.2.4 Collectively, the Applicant and NE are referred to as 'the parties.'

1.3. Purpose of this document

1.3.1 This 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 This 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)[4].

1.3.3 Paragraph 007 of the DLUHC Guidance states 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*".

1.3.4 The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between NE and the Applicant on matters relating to the DCO Application.

1.3.5 This SoCG will be updated as a result of ongoing discussions between the Applicant and NE.

1.3.6 This 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 DCO Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate's website (https://national-

[2] The Conservation of Habitats and Species Regulations 2017. Available online: https://www.legislation.gov.uk/uksi/2017/1012/contents/made
[3] Wildlife and Countryside Act 1981. Available online: https://www.legislation.gov.uk/ukpga/1981/69
[4] Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (30 April 2024).

infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010149/documents).

1.3.8 Once finalised, this 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.

1.3.9 For the purposes of examination, this SoCG addresses the following key topic areas:

- Matters relating to protected species and habitats;
- Biodiversity Net Gain (BNG);
- Best and Most Versatile (BMV) agricultural land; and
- Monitoring, mitigation, and enhancement measures.

1.4. Terminology

1.4.1 This SoCG summaries the main matters covered and the status of the matter(s). The colour coding system used within the table in **Section 4** has been outlined below.

Cell	Status
	Agreed – indicates where a matter 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 undertaken within the parameters assessed in the Environmental Statement (ES), 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 **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/2.1]** [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 NE throughout the DCO Application process, including during 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 NE in relation to the DCO Application.

Table 1 – Record of Engagement

Date	Form of correspondence	Key matters discussed and key outcomes
20 June 2023	Virtual meeting	• NE did not have any concerns on the scope of the ecological and habitat surveys. • NE recommended that any advice on the scope and method of surveys and licensing, if required, should be requested by the Discretionary Advice Service.
11 September 2023	Virtual meeting	• Discussion about the agricultural land classification (ALC) survey and the consideration of BMV land in the development of the design. • NE requested for an ALC survey to be undertaken of the proposed cable route locations connecting each parcel to help inform the management requirements of the soil, which will be documented within, and secured by, an outline management plan which will be submitted in support of the DCO Application.
15 January 2024	Virtual Meeting	• Discussion about ecology surveys and biodiversity design. • NE agreed with approach for great crested newt surveys and assumption of absence. • NE had reviewed the wintering birds results and agreed that due to distance and findings from the surveys, it is highly unlikely that the land within the Order Limits is functionally linked to the European Designated sites at 'The Wash'

Date	Form of correspondence	Key matters discussed and key outcomes
		Special Protection Area (SPA) designated for birds. • NE agreed that the bird surveys carried out in November 2023, December 2023 and January 2024 were sufficient. • Discussion about biodiversity mitigation strategy. NE recommended tree sparrow nest boxes.
03 May 2024	Virtual meeting	• Discussion about ALC survey outputs for the Grid Connection Corridor and other cable routes that have been surveyed. • Discussion following NE's review of the ALC survey reports. No initial concerns were raised. • Updates from the Applicant on the location of the Battery Energy Storage System and Springwell Substation. • NE requested for the Environmental Statement to provide a detailed breakdown of the percentage of each ALC grade for each element of the infrastructure.
17January 2025	Virtual meeting	• Discussion and update on the DCO Application documents and design.
02 May 2025	Virtual meeting	• Discussion on the Statement of Common Ground related to document updates and position between both parties.

4. Current Position

4.1 Position of the Applicant and NE

4.1.1 The following table sets out the position of the Applicant and NE, 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 this SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points.

Table 2 – Position of the Applicant and NE

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
Matters relating to protected species and habitats				
2.1	**International sites - Study Area**	The study area for statutory designated sites makes no reference to NE's Impact Risk Zones (IRZs); however, in pre-application consultation with the Applicant, NE established that no IRZs are triggered by the Proposed Development, and as such are content with the study area used (Table 7.2 from the **HRA Screening Report [EN010149/APP/7.17]** [APP-0150]).	This has been welcomed and agreed.	**Agreed**
2.2	**International Sites - identification**	The **HRA Screening Report [EN010149/APP/7.17]** [APP-0150] provides detail on the screening of Internationally Designated sites.	This has been welcomed and agreed.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
	of relevant sites	NE welcomes consideration of the Wash designations (SPA, Special Area of Conservation (SAC) and Ramsar), despite their distance from the Proposed Development at >30km, due to the mobile nature of qualifying features and hydrological connectivity.		
2.3	**International Sites - Functionally Linked Land (FLL)**	The **HRA Screening Report [EN010149/APP/7.17]** [APP-0150] para 4.5.1 notes NE's pre-application consultation response regarding FLL. This position remains unchanged. NE welcomes the **Wintering Bird Survey Data [EN010149/APP/6.3]** [APP-084] which supports the screening out of impacts from the proposal on qualifying bird species. NE also concurs with the justification that the Order Limits does not	This has been welcomed and agreed.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		comprise functionally linked land for other qualifying species (i.e. seal and otter).		
2.4	**International Sites - HRA Screening Report and hydrological connectivity**	Hydrological connectivity from the development site to the Wash SPA, SAC and Ramsar is acknowledged within the **HRA Screening Report [EN010149/APP/7.17]** [APP-0150]. NE concurs with the assessment that impacts from water-borne pollutants are unlikely as a result of the Proposed Development. The nature of the Proposed Development, alongside the distance from the designations and embedded mitigation measures (Outline Environmental Management Plan, Outline Operational Environmental Management Plan, Outline Decommissioning Environmental	This has been welcomed and agreed.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		Management Plan), means that any pollutants from the development site are highly unlikely to alter the background pollution at the designations, and thus are considered to have no appreciable effect.		
2.5	**International Sites - in-combination assessment**	NE concurs that the project is unlikely to work in combination with any other plans/projects to cause a significant effect upon any Internationally Designated sites. NE concurs that the land within the Order Limits does not comprise FLL for any of the qualifying features of the designated European sites, the project would not result in any in combination impacts via FLL. In addition, whilst hydrological connectivity is identified, the absence of any appreciable effect	This has been welcomed and agreed.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		via water-borne pollutants from the proposal means the proposal cannot work in combination to cause any impacts via water pollution.		
2.6	**International Sites - conclusions**	NE concurs with the conclusions of the **HRA Screening Report [EN010149/APP/7.17]** [APP-0150].	This has been welcomed and agreed.	**Agreed**
2.7	**National Sites - conclusions**	No nationally designated nature conservation sites (i.e. SSSIs) have been identified within the study area and no impact pathways to any such designations have been otherwise identified. As such, impacts to nationally designated sites have been scoped out of further assessment (Table 7.4 from the **ES Volume 1, Chapter 7: Biodiversity**	This has been welcomed and agreed.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		[EN010149/APP/6.1] [APP-047]). NE concurs with this conclusion.		
2.8	**Ancient woodland and ancient/veteran trees**	Table 7.4 from the **ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1]** [APP-047] shows that Ancient Woodland has been scoped out of further assessment, as no Ancient Woodland sites are located within the Order Limits and only one Area of Ancient Woodland has been identified within 2km of the Order Limits. There will be no direct loss or damage to Ancient Woodland as a result of the development; thus NE has no specific comments to make in this regard and refer to Standing Advice.	This has been welcomed and agreed.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2.9	**Nationally designated landscapes**	NE has no specific comments to make on the landscape implications of this development. NE concurs with the Applicant's assessment that nationally designated landscapes can be scoped out of further assessment (Table 10.3 from the **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050]).	This has been welcomed and agreed.	**Agreed**
2.10	**Protected Species Licencing - avoidance in embedded design**	NE has not reviewed protected species survey approaches and results in detail but welcomes the Applicant's design approach to avoidance of impacts, which is in line with the established 'mitigation hierarchy'. No licence requirements have been identified to date; however, any future need for any European Protected Species (EPS) licences from NE	The Applicant agrees with NE's position and welcomes the acknowledgement that the approach to avoidance by design is consistent with the mitigation hierarchy. The Applicant confirms that, should further surveys indicate the need for a EPS licence, an application will be made in the usual manner. For the avoidance of doubt, Part 2, Article 6 (disapplication and modification of statutory provisions) of the **Draft DCO [EN010149/APP/3.1.2]** does not alter the	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		will need to be applied for in the usual manner.	requirement to obtain relevant protected species licences.	
2.11	**Great crested newt survey**	NE agrees with the approach for Great Crested Newt surveys and assumption of absence.	All ponds within the Order Limits and within up to 500m of the Order Limits have been tested for great crested newt eDNA. All suitable ponds tested negative for great crested newt eDNA (although two ponds were 'indeterminate', they were also considered likely negative due to their close proximity to other ponds which tested negative). Details of the surveys are provided in **ES Volume 1, Appendix 7.1: Preliminary Ecological Appraisal [EN010149/APP/6.3.2]**.	**Agreed**
2.12	**Wintering bird survey**	After review of the wintering bird surveys carried out between November 2023 and January 2024, NE considers it is highly unlikely that the land within the Order Limits is functionally linked to 'The Wash' SPA and agreed that a further wintering bird in February would be unnecessary.	This has been welcomed and agreed.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
Biodiversity Net Gain				
2.13	**Biodiversity Net Gain (BNG)**	Paragraph 7.4.24 from the **ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1]** [APP-047] states that despite not being mandatory, the Applicant is still committing to achieving BNG. As it stands, the Proposed Development will give rise to: • 31.66% net gain in habitat units • 20.68% net gain in hedgerow units • 0% net gain watercourse units NE welcomes the gains illustrated in habitat and hedgerow units, but note that, once BNG is mandated for NSIP projects, a 10% gain in	Requirement 8(2) of the **Draft DCO [EN010149/APP/3.1.2]** secures the minimum 10% BNG in habitat units, watercourse units and hedgerow units for all of the Proposed Development. As set out in section 2.4 of **ES Volume 3, Appendix 7.14: Biodiversity Net Gain [EN010149/APP/6.3.2]**, the trading rules set minimum habitat creation and enhancement requirements to compensate for specific habitat losses, up to the point of no net loss. They are based on the habitat type and distinctiveness of the lost habitat. Losses of higher distinctiveness habitats require replacement of the same habitat type to satisfy the trading rules, while losses of lower distinctives can be replaced by similar or better habitats. The trading rules have been followed throughout the Biodiversity Net Gain Assessment in **ES Volume 3, Appendix 7.14: Biodiversity Net Gain [EN010149/APP/6.3.2]**.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		watercourse units would be required (despite the fact there is no net loss and trading rules have been satisfied). The BNG Metric Calculations provided at the end of **ES Volume 3, Appendix 7.14: Biodiversity Net Gain [EN010149/APP/6.3]** [APP-095] illustrate this. Natural England welcome the clarity provided that a minimum of 10% BNG will be provided for watercourse units.	The trading rules are not currently met as the new approximately 15km of hedgerow planting has not indicated which will have either a ditch or bank associated with it, and it is this that gives the extra distinctiveness required. The final BNG assessment report and final Landscape and Ecology Management Plan (LEMP) will ensure an appropriate proportion of the new hedges have either a back or ditch associated with them to satisfy the trading rules. The final BNG assessment report and LEMP will be secured via requirement 8 of the **Draft DCO [EN010149/APP/3.1.2].** With regards watercourse units, the **ES Volume 3, Appendix 7.14: Biodiversity Net Gain [EN010149/APP/6.3.2]** has been updated at Deadline 1 showing that reducing encroachment in the riparian zone will deliver a 13% net gain in watercourse units.	
BMV agricultural land				

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2.14	**Best and Most Versatile (BMV) land**	At Statutory Consultation, NE welcomed the avoidance of Grade 1 and 2 land for the Substation and BESS, but advised that avoiding all BMV would be preferable. Where avoidance of BMV land for these pieces of infrastructure is not possible, justification/rationale should be provided. NE would recommend that further breakdown of the permanent and temporary land take (and the proportion/amount of BMV land) for each element of the development, including: Solar PV, mitigation/enhancement areas, retained agricultural land, Substations/BESS infrastructure, cable routes and access tracks.	The Applicant has minimised its use of BMV land where practicable and provides clear justification for the necessity to site certain infrastructure on BMV land in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** [APP-044], **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** and the **Design Approach Document [EN010149/APP/7.3.2]**. The Springwell Substation is proposed to be sited on land which is grade 3a (6.9 ha) and grade 3b (8.7 ha). The BESS is proposed to be sited on land which is grade 3a (12.6 ha) and grade 3b (0.93 ha). The siting of these facilities has considered multiple factors, such as BMV land, landscape and visual amenity, noise, distance to the point of connection (the proposed National Grid Navenby Substation) and access requirements as detailed in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** [APP-044]. Details relating to the assessment of impact on soil of grades 3a and 3b is provided in **ES**	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]. A breakdown of the permanent and temporary land take along with the proportion of BMV land is provided at Table 11.12 in **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2],** with the collector compounds, Springwell Substation, BESS and Solar PV development being classified as temporary land take, and the green infrastructure being considered as permanent land take for the purposes of the land, soil and groundwater assessment. The worst case assumption that has been assessed for the permanent land take for green infrastructure affects a total area of 166.2ha, of which 77ha is 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 mitigation areas that are to be incorporated into the Proposed Development in	

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			order to provide beneficial biodiversity mitigation and enhancement. The Applicant acknowledges that this area of permanent green infrastructure results 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.	
2.15	**Soil health**	At Statutory Consultation, NE noted that although arable reversion to grassland has been shown to benefit soil quality (through increased Soil Organic Matter (SOM)), it is unclear what impact solar arrays will have on soil properties such as carbon storage, structure and biodiversity. Therefore, it is currently unknown what the overall impact of a temporary Solar development will have on soil health. In the absence of this information, NE suggests	The Applicant has assessed impacts on soil properties as a result of agricultural use being paused for the duration of the Proposed Development, and other elements varying due to the presence of the Solar PV modules. Based on the proposed and anticipated changes to soil use, overall soil health is expected to improve due to the reduction in agricultural use, providing an opportunity for soil nutrient levels to improve, and less stress on soil physical properties. Soil will be managed throughout the construction, operation and decommissioning phase in accordance with the measures detailed in the **Outline Soil Management Plan (oSMP)**	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		that there is an opportunity for the developer to commit to a programme of soil health monitoring for the lifetime of the project to support development of the evidence base around long-term impacts to soil health from solar development.	**[EN010149/APP/7.11.2]** secured by Requirement 18 from the **Draft DCO [EN010149/APP/3.1.2]**. The **oSMP [EN010149/APP/7.11.2]** states that soil conditions will be monitored by an appropriately trained person prior to soil handling operations, as detailed in Paragraphs 3.1.4 and 3.1.5. The Applicant is proposing to undertake a programme of soil health monitoring which would follow the 'AHDB Soil Health Scorecard Approach Protocol' which is considered to be a recognised method to undertaking soil health assessments. This would involve undertaking a baseline assessment prior to the construction phase, which is repeated at year 5 and 15 during the operational phase. This proposed approach would include the following assessments: • A visual assessment of topsoil structure (VESS) – field assessment • Earthworm population – field assessment • Soil pH & routine nutrients – laboratory testing	

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			• Soil organic matter content– laboratory testing • Microbial activity – laboratory testing The assessments would be undertaken at 10 locations at each visit with visits repeated at the same location each time. The **oSMP [EN010149/APP/7.11.2]** has been updated at Deadline 1 to reflect the above commitment to soil health monitoring.	
2.16	**ALC survey results**	NE has reviewed the ALC surveys and welcome the full detailed resolution survey, including the survey of the cable corridor and has no further comments regarding the ALC survey methods.	This has been welcomed and agreed.	**Agreed**
2.17	**ES Volume 1, Chapter 11: Land, Soil and Groundwater, Table 11.12.**	Table 11.12 from **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1]** [APP-051] presents a breakdown of land use	The construction components of the Proposed Development have not been included within Table 11.12 of **ES Volume 1, Chapter 11: Land, Soils and Groundwater [EN010149/APP/6.1.2]** as this table outlines the	**Under Discussion**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		across the Order Limits, broken down into temporary and permanent uses, and by ALC grade. Table 11.12 does not specifically categorise any construction compounds or access tracks.	key components that form part of the Proposed Development during the operational phase. The construction compounds will be located in areas of proposed infrastructure, for example, the Primary Construction Compound in Springwell East would be located in Field C8 and would thereafter be used for Solar PV development. The area of Solar PV development is specified within Table 11.12. The majority of access tracks will follow existing agricultural tracks, therefore any impacts on BMV land will be minimal and temporary. Table 11.12 has been updated at Deadline 1 to include a breakdown of the ALC grade for the Grid Connection Corridor and cabling areas for clarity.	
2.18	**Avoidance of BMV land**	It is noted that whilst a large proportion of the land is classified as BMV land, efforts have been made to avoid the highest quality land, highlighted in ES Table 4.3 (**ES Volume 1, Chapter 4:**	This has been welcomed and agreed.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		Reasonable Alternative Considered [EN010149/APP/6.1] [APP-044]), where various whole fields and partial fields have been removed from the originally defined development area. It is also noted that ALC survey was undertaken along two cable route options in the north-west of the Order Limits, along the eastern and western edges of fields bcd032, bcd036 and bcd042 (ES Figure 11.1) (**ES Volume 2, Figures Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1]** [APP-067]). Whilst the survey indicated minimal difference in ALC grade, the eastern corridor contains a small proportion less Grade 2 land and as such has been taken forward.		

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2.19	**Permanent loss of BMV land**	NE advised that BMV land should be avoided wherever possible for permanent development, to safeguard the long term agricultural potential of the land. While NE acknowledges some green infrastructure may not result in irreversible BMV loss, further justification have been requested for areas of permanent green infrastructure on BMV land. NE also advise that habitat creation on its own may not automatically result in a loss of BMV. This is because ALC grading is based around the long term, inherent properties affecting agricultural capability (climate, site and soil) and versatility, not nutrient levels or having a specific type of cropping or stocking.	For the purposes of the land, soil and groundwater assessment which is presented in **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** a worst case has been assessed that assumes all green infrastructure would be permanent. This approach has been undertaken in this assessment to consider the worst case impacts to BMV land. As set out in **ES Volume 1, Chapter 5: Approach to the EIA [EN10149/APP/6.1]** [APP-045] a worst case scenario is used to calculate the impacts for each of the environmental assessments to ensure a robust assessment is undertaken. However, noting that it is likely that some of this land may be temporary and will be returned to agricultural use following the decommissioning of the Proposed Development. At the end of the decommissioning of the Proposed Development, the Applicant no longer has any rights over the land and the land will be handed back to the landowner. Whilst it is assumed that the land would return to agricultural use the Applicant does not have the rights to enforce this and the	**Under Discussion**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		NPS-EN1 paragraph 5.11.34 states: 'The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land…'. As a result, NE requested further justification for the use of this BMV resource for these areas of irreversible land use change. It is noted that there are some areas of green infrastructure that are considered temporary. NE also requested clarification regarding any consideration given to the siting of the 'irreversible' green infrastructure away from BMV land, prioritising the siting of	landowner at this point will decide on how they wish to manage their land. For example, the landowner may choose, to retain the areas of calcareous and neutral grassland to support their agricultural business through grazing, green hay / fodder production or they may revert the land to arable, or further diversify their agricultural business and manage it for carbon sequestration or other environmental management schemes. Whilst the Proposed Development does not ensure that the land will be returned to agricultural use, it does not prejudice this happening with the exception of structural planting. As set out in **ES Volume 1, Chapter 3: Proposed Development Description [EN10149/APP/6.1.2]** Paragraph 3.17.6 states that following decommissioning of the Proposed Development, the land will be handed back to the landowners and it is assumed that the landowner would return the land to agricultural use. With the exception of landscape structural planting, including tree belts and hedgerows, created to	

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		'temporary' green infrastructure elements on BMV land, so as to avoid compromising options for the future use of the BMV land, or undermining its inherent capability. NE considers this permanent loss of BMV land has been appropriately assessed within the ES, being attributed a 'significant (adverse)' effect on agricultural land use during 'operation (including maintenance) and decommissioning'. (ES paragraph 11.9.27).	deliver biodiversity mitigation and enhancement, the proposed green infrastructure is a temporary impact for the duration of the Proposed Development. The permanent land take as a result of structural planting as shown on the Green Infrastructure Parameter Plans 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 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. **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]** has been updated at Deadline 1 to remove reference to landscape structural planting, as this is incorrect. The areas that are considered permanent for the purposes of the land, soil and groundwater assessment include all green infrastructure proposed as part of the Proposed Development to ensure a worst-case assessment.	

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			Section 5 and 6 of the **Design Approach Document [EN010149/APP/7.3.2]** show how the Applicant has developed the design of the Proposed Development to prioritise the use of non-BMV land for the creation of Green Infrastructure in accordance with Project Principle 8.3. For example, the creation of grassland habitats in Fields By20, Bcd079, E2, Bcd114, Bcd115 and Tb2 are all aligned to non-BMV land. In some instances, temporary Green Infrastructure is located on BMV land within the Order Limits. Where this occurs, it has been carefully considered in balance with other environmental factors. For example, proposals to create grassland habitat on Grade 2 BMV land near to Bloxholm Woods (Fields Bcd140 and Bcd141) takes account of sensitive below ground archaeology at this location which renders the land unsuitable for arable production. This location also provides a good opportunity to extend and enhance the Local Wildlife Site (Project Principle 3.1). In this instance, the creation of grassland habitat on BMV land is considered to be appropriate and reflects the interdisciplinary approach to design which has been adopted by the Applicant.	

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			The location of green infrastructure, in the form of landscape structural planting, has been informed by the requirement to mitigate landscape and visual effects. As a result, in some instances, the relocation of planting to avoid areas of best and most versatile land has not been possible. These measures are secured through the **Outline Landscape and Ecology Management Plan (oLEMP) [EN010149/APP/7.9.2]**, the **Design Commitments [EN010149/APP/7.4]** [APP-0138], and Requirement 8 of the **Draft DCO [EN010149/APP/3.1.2]**, which ensures delivery of the final Landscape and Ecology Management Plan.	
2.20	**Time limit**	NE welcomes the inclusion of a 40 year time limit for the Proposed Development. The inclusion of the time limit within the DCO provides further certainty the proposed temporary land use changes will remain temporary as described,	This has been welcomed and agreed.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		subject always to appropriate soil management.		
2.21	**Soil handling**	NE generally welcomes the content of the **Outline Soil Management Plan (oSMP) [EN010149/APP/7.11]** [APP-0144], but recommends stronger measures to avoid soil handling during the wetter winter period. While they welcome provisions such as wet weather stop conditions and soil moisture testing, they advise restricting soil handling to the drier months (April–September) wherever practicable, particularly where land will be returned to agricultural use. Where winter handling cannot be avoided, they suggest increased supervision by trained personnel..	The **Outline Soil Management Plan [EN010149/APP/7.11.2]** has been updated at Deadline 1 to include clear instructions on how to restore soils back to previous ALC grade following construction and to specify that suitably trained personnel will supervise winter construction, where avoidance of the wetter winter period is not possible.	**Under Discussion**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2.22	**Reinstatement**	NE advises that the **oSMP** [APP-0144] should explicitly commit to restoring agricultural land to its original ALC grade, informed by the pre-development ALC survey. NE also queries why the **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1]** [APP-051] limits hardstanding removal to a depth of up to 1m, although the **oSMP [EN010149/APP/7.11]** [APP-0144] provides details of restoration methods for each part of the development, which do not include reference to removal of hardstanding up to a depth of 1m, and NE considers these to be appropriate. As the **oSMP [EN010149/APP/7.11]** [APP-0144] (and ultimately Soil Management Plan) will be the relevant control	The **Outline Soil Management Plan [EN010149/APP/7.11.2]** has been updated at Deadline 1 to clarify that the land will be returned to original ALC grade, informed by the pre-development ALC survey outputs. At decommissioning all below ground infrastructure, including cabling, within 1m of the ground surface would be removed. This would allow cultivation of land after the Proposed Development has been decommissioned and avoid any unnecessary handling and impacts of the soil. Leaving infrastructure in place below 1 m depth will not limit farm cultivations, as they are typically limited to the upper 450 mm of soil (subsoiling). Further detail is provided in the **Outline Decommissioning Environmental Management Plan [EN010149/APP/7.13.2]** and **oSMP [EN010149/APP/7.11.2].** With regards to **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2]**, the areas of hardstanding will be restored using	**Agreed**

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		documents that will govern the restoration on site, NE doesn't consider this to be a major issue, but would welcome clarity on the wording of the ES. NE also questions the **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1]** [APP-051] reference to importing topsoil for restoration, stating that proper soil management during construction should ensure sufficient onsite resources. Again, since the **oSMP [EN010149/APP/7.11]** [APP-0144] does not mention topsoil importation and outlines acceptable restoration practices, NE is satisfied but requests clarification in the ES.	the soil retained onsite and it is not anticipated that any new topsoil will be brought to the land within the Order Limits. **ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2** has been updated at Deadline 1.	
Monitoring, mitigation and enhancement				

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2.23	**Habitat connectivity**	NE recommend that connectivity of existing and created habitats is made a key consideration for the biodiversity design of the project. Due to the scale of the development site, there is the unique opportunity to enhance the connectivity of habitats in and around the Order Limits, and contribute towards the development of the Nature Recovery Network on a landscape scale. Key ecological corridors should be illustrated within the development plans.	Habitat creation and enhancement proposals have been designed to improve connectivity across the Order Limits, such as strategic planting of 15,563m of new hedgerows and 16ha of new tree belts. Key ecological corridors have been designed, including a large ecological corridor in Springwell West across the A15 to provide ecological connectivity within the Order Limits. Proposals are shown in **ES Volume 2, Figure 3.3: Green Infrastructure Parameters Plans [EN010149/APP/6.2.2]** detailed and secured by the **oLEMP [EN010149/APP/7.9.2]**. The final BNG assessment report and LEMP will be secured as required via Requirement 8 of the **Draft DCO [EN010149/APP/3.1.2].**	**Agreed**
2.24	**Woodland/ hedgerow creation and enhancement**	Opportunities should be sought to create/enhance woodland and hedgerow features through the development, not be limited to protection. For example, woodland creation to connect currently isolated woodland block	Habitat creation proposals are shown in **ES Volume 2, Figure 3.3: Green Infrastructure Parameters Plans [EN010149/APP/6.2.2]** and detailed in the **oLEMP [EN010149/APP/7.9.2]** these clearly indicate that existing habitats will be better linked at a landscape scale.	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		within/adjacent to the development site, or creation of soft edges to existing woodland bounded by arable land. Consideration should continue to be given to other matters, i.e. BMV land take, where exploring these opportunities.	Approximately 15,563m of new hedgerow and 16ha of new tree belts are proposed in strategic locations across the Order Limits, adjacent to existing woodlands, such as Bloxham Woods, to enhance ecological connectivity and to allow the creation of 'soft edges'. The proposed planting is considered to be a significant beneficial effect.	
2.25	**Connecting people with nature**	Consideration should be given to closures/diversions of Public Rights of Way (PRoW) during construction and decommissioning. There may be opportunity to develop increased understanding of, or association with, the development where routes with visual access into the development site are retained during construction so users are able to see the progress of the development.	It is expected that any temporary closures of Public Rights of Way would not extend beyond six months in duration. Diversion opportunities and any diversion requirements would be outlined at detailed design, with potential routes identified within the **Outline Public Rights of Way and Permissive Path Management Plan [EN010149/APP/7.12.2]**. Liaison with LCC Highways and PRoW officers has been undertaken, outlining expected requirements for PRoW crossings, temporary closures during construction and potential diversion options in Springwell East as outlined within the **Outline**	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		NE would encourage a variety of habitat creation/enhancement measures to be incorporated along these routes, within the buffer areas, to both develop strong ecological corridors, but also develop a varied experience for users of the PRoW. Figures 9.3a-d of the PEIR illustrate the fact that there are very few PRoW in the South-West area of the development site. In addition, review of the Accessible Natural Greenspace profile and Accessible Green Infrastructure layers on the NE Green Infrastructure mapping tool show that despite it's rural nature, the development site and surrounding areas have poor greenspace provision and accessible Green Infrastructure. The establishment of permissive footpaths and	**Public Rights of Way and Permissive Path Management Plan [EN010149/APP/7.12.2]**. In some areas it may be possible for PRoW users to view the progression of the Proposed Development during the construction phase. For example, where PRoW remain open adjacent to the Proposed Development, or at crossing points controlled by bankspersons. However, as set out in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] the Applicant has generally sought to reduce visibility of the Proposed Development from PRoW. The Applicant has developed the design of the Proposed Development to create an enhanced and better connected footpath and cycle network. This includes approximately 3.49km of additional PRoW which would be permanent and would leave a legacy of enhancement. In addition, the Applicant is proposing a community growing area within Springwell East which would be linked to the wider countryside and village of Scopwick by the Public Right of Way network.	

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		accessible enhancement areas may be increasingly valuable in improving the Green Infrastructure provision for the surrounding local communities. NE would strongly encourage including interpretation of the development itself, for example highlighting the biodiversity enhancements, electricity generation, and mitigation measures associated with the project. NE would highlight the opportunity to monitor the effect of the development on the PRoW network.	Perimeter fencing surrounding the Solar PV development would be offset at least 15m from either side of existing and proposed statutory PRoW. In addition to this, Independent Outdoor Equipment (transformer, switchgear and central inverters) and Inverter and Transformer Station will be offset at least 50m from all existing and proposed PRoW. Both of these offsets would be secured by the **Design Commitments [EN010149/APP/7.4]** [APP-0138]. These corridors will greatly improve green infrastructure corridors and connectivity around and within the Order Limits such as along existing field boundaries and PRoWs. The proposals for Green Infrastructure include the creation of 100ha of grassland, enhancement of field margins, herbal ley and grassland treatments under solar PV modules and planting of 15,563m of new hedgerow and 16ha of new tree belts.	

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			Further details on the PRoW improvements and ecological enhancements are provided in the **oLEMP [EN010149/APP/7.9.2]**. This was noted in the design development and the design has sought to address this and provide better connectivity in the south west of the Order Limits and east to west, creating a link across the A15. Further details on the PRoW improvements and ecological enhancements are provided in the **oLEMP [EN010149/APP/7.9.2]**. The Proposed Development would implement interpretation boards at appropriate junctions of PRoWs within the Order Limits, which will allow for opportunities to better understand the positive contribution the Proposed Development will make in adapting to climate change. Further detail is provided and secured in the **oLEMP [EN010149/APP/7.9.2]** and further detail on this will be provided in the detailed LEMP which is secured by a requirement in the **Draft DCO [EN010149/APP/3.1.2]**.	

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2.26	**Ecological enhancements**	At Statutory Consultation, NE noted that the physical characteristics of the areas proposed for enhancements must be considered, for example, understanding the nutrient index, soil type or wetness, to appropriately inform habitat enhancement measures and their ongoing management. The ongoing management of habitats should be secured via the LEMP, including measures to address any habitat establishment failures.	The Applicant appreciates the need to understand the physical characteristics of the areas proposed for enhancement. This has informed the mitigation measures outlined in the **oLEMP [EN010149/APP/7.9.2]**, where a discussion about the process underpinning the biodiversity design taking exactly these issues into account is outlined, the landscape character and biodiversity opportunities being key drivers behind the biodiversity design response. The final LEMP will be secured via Requirement 8 of the **Draft DCO [EN010149/APP/3.1.2].** The wetter, heavy soil in Springwell East and comparatively dry lighter soils in Springwell Central and Springwell West were considered in the design of habitat creation and improvement measures, which are detailed in the **oLEMP [EN010149/APP/7.9.2]**. The management of habitats within Order Limits and measures to address any habitat establishment failures are secured in the **oLEMP [EN010149/APP/7.9.2]** with further detail to be	**Agreed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			provided in the detailed LEMP which will be secured via Requirement 8 of the **Draft DCO [EN010149/APP/3.1.2]**.	

5. Signatures

This SoCG is agreed upon:

On behalf of NE

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date: