

# Springwell Solar Farm

## Statement of Common Ground – UK Health Security Agency

EN010149/APP/8.6  
Deadline 1  
June 2025  
Springwell Energyfarm Ltd  
Planning Act 2008

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<sup>1</sup> ('the 2008 Act').
- 1.1.2 Springwell Solar Farm ("Springwell") 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").
- The SoCG is being submitted to the Examining Authority as an agreed final version between both parties after due consideration and updates as part of the examination process.
  - Confirmation of the UK Health Security Agency's agreement is appended to this document.

## 1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by the Applicant and UK Health Security Agency.
- 1.2.2 UK Health Security Agency are a statutory stakeholder defined for the Springwell Solar Farm Development Consent Order application.
- 1.2.3 Collectively, the Applicant and UK Health Security Agency are referred to as 'the parties.'

## 1.3 Purpose of this document

- 1.3.1 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').
- 1.3.2 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".*
- 1.3.3 The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between UK Health Security Agency and the Applicant on matters relating to the Application.
- 1.3.4 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.
- 1.3.5 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 website.

- 1.3.6 This final version is submitted to the Examining Authority concerning the Application under section 37 of the 2008 Act for an order granting development consent for the construction of the Proposed Development.

## 1.4 Terminology

- 1.4.1 In the table in the issues chapter of this SoCG:

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

## 2. Proposed Development Description

### 2. Introduction

- 2.1. 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.
- 2.2. The DCO would, amongst other things, authorise the Applicant to construct, operate and maintain the Proposed Development. 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;
  - Battery Energy Storage System (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 development;
  - Landscaping, habitat management, biodiversity enhancement and amenity improvements; and
  - Works to facilitate vehicular access to the Site.

## 3. Record of Engagement

### 3.1. Summary of consultation

- 3.1.1. The parties have been engaged in consultation throughout the early stages of the project and examination process. Table 1 shows a summary of key engagement that has taken place between the Applicant and UK Health Security Agency in relation to the Application.

**Table 1 – Record of Engagement**

Date	Form of correspondence	Key topics discussed and key outcomes
Letter dated 17/02/2025	Relevant Representation letter	Document issued by the UKHSA as part of the DCO process prior to examination.
18/03/2025	Online meeting	Agreement on the phasing of information to be provided during examination and after the DCO process as part of detailed design.  No further plume analysis is required at this time but will be completed as part of detailed design with the BESS chemistries and standards relevant at that future time.  An updated version of the <b>BESS Plume Assessment [EN010149/APP/7.19.2]</b> is provided at Deadline 1 to clarify specific points.
04/04/25	Draft SOCG issued by the Applicant for comment by the UKHSA	Draft summary of positions
Letter dated 16/04/2025	UKHSA letter responding to draft SOCG	Further points for discussion and agreement
28/04/25	Online Meeting	Discussion on the draft SOCG issued by the Applicant and responded to by letter by UKHSA 16/04/2025. SOCG simplified and agreement made on all topics. Further information put into a letter from the Applicant to UKHSA.
08/05/2025	UKHSA letter confirming agreement with the draft SOCG	Applicant to submit final version of SOCG.

## 4. Current Position

### 4.1 Position of the Applicant and UK Health Security Agency

- 4.1.1. The following tables set out the position of the Applicant and UK Health Security Agency, following meetings and discussions with respect to the key concerns raised in the Relevant Representation letter. All matters have been agreed.
- 4.1.2. This is the final SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points. A letter is provided at Appendix A that confirms the UK Health Security Agency consider this SoCG as the final version.

**Table 2 - Topics Discussed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
1	Suitability of modelling methodology	The criteria used for assessment are related to mortality, and therefore do not consider more minor health impacts which may be caused through exposure to a BESS plume;	<p>Following the meetings with UKHSA, the Applicant understands that UKHSA would like the detailed design plume assessment (post DCO process) to be based on atmospheric dispersion modelling, thereby understanding what would be emitted and impact on sensitive receptors with comparison to air quality standards.</p> <p>The future running of a plume assessment at detailed design stage is secured in paragraph 4.2.10 of <b>Outline Battery Safety Management Plan (oBSMP)</b> [EN010149/APP/7.14.2].</p> <p>The Applicant clarifies that because of the buffer zones to sensitive receptors, the Applicant is confident that any toxic gas emissions to sensitive receptors will be below relevant public health exposure levels.</p> <p>The Applicant has presented suitable examples of projects with similar BESS chemistry where fire emissions were below AEGL-1 levels (&lt;1PPM) at 320m, which is nearer than the closest receptor within the Proposed Development. This will be checked by</p>	Agreed

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			the Applicant specifically for the Proposed Development at the detailed design stage.	
2	Suitability of modelling methodology	The assessment methodology is not protective of vulnerable people such as children, older adults, and those with pre-existing health conditions;	<p>The future plume assessment as part of detailed design, will consider the UK Air Quality Objectives, relevant public health exposure levels and standards; it will report against relevant measures and thresholds as deemed by evolving best practise or standards. For instance the NFCC Guidance updates that are expected to include definitions and considerations of sensitive receptors.</p> <p>Whilst the UKHSA has agreed that the matter can be resolved at detailed design stage, as an immediate response to the concern raised the Applicant has given the UKHSA full opportunity to interrogate and test the technical data that supports the non-technical summary in the <b>BESS Plume Assessment [EN01049/APP/7.19.2]</b>.</p> <p>Toxic gas emissions and production of Particulate Matter (PM) in a BESS fire will also be included in the future assessment.</p>	Agreed
3	Suitability of modelling methodology	PM10 and PM2.5 have been excluded from the plume assessment. Particulate matter would be present in the plume and the potential health impacts should therefore be considered as part of the plume assessment;	<p>PM2.5 &amp; PM10 exposure thresholds are not currently set by any standard. The future plume assessment will consider standards from the UK Air Quality Objectives and AEGLs alongside other guidelines e.g. for visibility etc. The Applicant confirms the Applicant will accommodate UKHSA recommendations that Particulate Matter, Nitrogen Oxides and Benzene, are assessed together with all other significant toxic gases produced by the selected BESS</p>	Agreed

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			system. Based on current assumptions of the BESS chemistry, the gases are likely to include Carbon Monoxide, Methane, HF, and HCl. The final assessment will be based on a contemporary evaluation of the actual BESS chemistry selected.	
4		It is not clear that locally relevant meteorology data has been used in dispersion modelling assessments, nor considered whether topography is relevant;	Locally relevant meteorology data has been considered in the current modelling approach, 29 years (uninterrupted) wind data from the Waddington Met Office weather station was utilised in the Plume Study. A worst case site emission wind speed of 2 m/s and 5m/s was applied to all directions, not just prevailing south-westerly wind.  Site topography was considered in the plume study, urban or forest terrain with partly cloudy conditions were assumed to be most representative of the Springwell site locations and included in modelling assumptions	Agreed
5		Quantitative data for both thermal runaway and fire phases has not been provided and used as input data for dispersion models;	The Applicant confirms that the modelling incorporated both detailed gas composition data and a range of BESS system thermal runaway burn out timeframe scenarios. the Applicant is giving the UKHSA full opportunity to interrogate and test the technical data that supports the non-technical summary in the <b>BESS Plume Assessment [EN01049/APP/7.19.2]</b> .	Agreed
6		It is stated that testing for absence of module-to-module propagation will be done, but not stated how robustly this will be done, for	The future plume assessment / consequence modelling conducted at the detailed design stage will take into account relevant best practice, standards and legislation at the time e.g. NFPA 855 and National Fire Chief Council guidance.	Agreed



Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		example to include worst case wind speed and direction and for both explosion debris as well as thermal impacts.	<p>Separate Fire and Explosion risk assessments and consequence modelling will be conducted at the detailed design stage which will incorporate site specific worst case wind scenarios.</p> <p>Agreements have been made with Lincolnshire FRS, including on design and response to a thermal runaway event see <b>Draft Statement of Common Ground - Lincolnshire Fire and Rescue Service</b> [EN010149/APP/7.24] <a href="#">[APP-0157]</a> and oBSMP [EN010149/APP/7.14.2]</p>	

## Signatures

This statement of Common Ground is agreed upon:

On behalf of UK Health Security Agency

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:

# Appendix 1

## UKHSA Letter





UK Health  
Security  
Agency

Environmental Hazards and Emergencies Department  
Seaton House, City Link  
London Road  
Nottingham, NG2 4LA

[nsipconsultations@ukhsa.gov.uk](mailto:nsipconsultations@ukhsa.gov.uk)  
[www.gov.uk/ukhsa](http://www.gov.uk/ukhsa)

Your Ref: EN010149  
Our Ref: CIRIS 92336

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

8<sup>th</sup> May 2025

[REDACTED] [REDACTED]

**Nationally Significant Infrastructure Project: Springwell Solar Farm, Lincolnshire  
Statement of Common Ground - Final**

Thank you for providing a final Statement of Common Ground and additional information relating to the above development on 1<sup>st</sup> May 2025. UKHSA provides its comment in the form of a letter, rather than signing a third-party document.

We can confirm our agreement with all elements of the Statement of Common Ground (1<sup>st</sup> May 2025) and have no further comments at this stage.

Yours sincerely,

On behalf of UK Health Security Agency  
[nsipconsultations@ukhsa.gov.uk](mailto:nsipconsultations@ukhsa.gov.uk)

*Please mark any correspondence for the attention of National Infrastructure Planning  
Administration*