

By Email to:

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Dear Sir/Madam

Date: 9 June 2025

Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8 and 9, 10, and 17

Application by Springwell Solar for an Order Granting Development Consent for the Springwell Solar Farm Project

Following the Planning Inspectorates Rule 8 letter dated 13 May 2025 the County Council submits its written representation in respect of this application. The Council provided initial comments in relation to this application in its Relevant Representation response earlier this year and full details on the impacts of the development in our Local Impact Report (LIR) submitted 3 June 2025 at deadline 1.

This written representation provides the Council's updated position following consideration of the application by the Council's Planning and Regulation Committee on 9 June 2025.

This written representation has been prepared in accordance with PINS advice note 8.4 and should be read in conjunction with the Council's LIR submitted by the Council at deadline 1. The LIR was brought to the Council's March 2025 Planning Committee when it was resolved to approve the Impact Report for submission. Based on the findings of this impact report the Council resolved to submit a **formal objection** to the application on the following grounds:

The project would produce 800MW of clean renewable energy that would support the nations transition to a low carbon future, deliver significant biodiversity net gain benefits through the creation of mitigation and enhancements as well. At this time these positive benefits are not considered to be outweighed by the negative impacts, that arise given

the overall size and scale of the development both on its own and in combination with the other NSIP scale infrastructure projects proposed in this geographical area as follows:

A significant negative impact upon the landscape character and visually both individually and cumulatively with other projects which results in the conclusion that the scheme would be contrary to Central Lincolnshire Local Plan policies S5 (Development in the Countryside), S14 (Renewable Energy) and S53 (Design and Amenity). By reason of its mass and scale, the development would lead to significant adverse effects on landscape character and visual amenity at all main phases of the scheme. The development has the potential to transform the local landscape by altering its character on a large scale which has the potential to affect a wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area. The alteration of views within an agricultural or rural landscape to that of a landscape with large scale solar development, would also result in significant adverse effects on views from receptors.

A significant permanent and negative impact as a consequence of the loss of 77 ha of BMV agricultural land is identified. The National Policy Statements direct that previously developed land, brownfield land, contaminated land, industrial land and non-BMV land should be developed as a preference, and where policies S14 and S67 of the CLLP seek to protect the best and most versatile agricultural land so as to preserve opportunities for food production and the continuance of the agricultural economy. The proposal also involves the temporary loss of 591 ha of BMV land under solar PV panels for 40 years, which is a substantial period. This loss is not only at a local level but significant when considered in-combination with the loss of land from other NSIP scale solar developments that are also being promoted and considered across Lincolnshire contrary to Central Lincolnshire Local Plan policy S67 (Best and Most Versatile Agricultural Land).

The assessment of built heritage and setting lacks key details and evidence to support conclusions and without this information it is not possible to fully understand the impact of the proposal and harm to the significance of heritage assets and at this stage is therefore considered to be contrary to Central Lincolnshire Local Plan policy S57 (The Historic Environment).

The level of archaeological investigations conducted so far is considered to be inadequate to assess the potential impact on buried heritage assets. There is a real risk of encountering significant, previously unknown remains. It is concluded that the proposed development would likely have a negative construction impact on heritage assets unless further evaluation and mitigation measures are implemented and at this

stage is therefore considered to be contrary to CLLP policy S57 (The Historic Environment).

Additional information is needed to demonstrate how discarded solar infrastructure, and materials would be sustainably managed. In terms of provision of facilities to process and recycle solar panels and associated equipment once they reach the end of their useful life there are currently no waste facilities to process discarded solar infrastructure as it is replaced during the lifetime of the development and at the decommissioning stage. When combined with the other solar projects in the County that have either had DCOs granted or that may be granted in the next twelve months, this will present a significant issue as additional facilities to ensure these products are sustainably disposed of will be needed and as such is considered to be contrary to LMWLP policy W1 (Future Requirements for New Waste Facilities).

Additionally, there are concerns about the certainty of Grid Connection which is a crucial aspect of this proposal and the potential risk for negative environmental impacts to occur from the Springwell development commencing, without the benefits of generation which would be relied upon for the grant of any consent being secured. In the event the Secretary of State be minded to grant consent for the development, it is recommended that the DCO should restrict the commencement of the development through a requirement, until such time that the Navenby substation has been granted consent and a material start has been made on the development.

In conclusion, whilst the Council currently objects to the proposed development on a number of grounds, the Council will continue to engage with the applicant and Examining Authority throughout the examination period in an attempt to resolve as many of these concerns as possible by the close of the examination.

Yours faithfully,

Head of Planning