

## SPRINGWELL SOLAR ACTION GROUP - 20052314

### Additional Deadline 3 Submission

#### Grid Connection - Response to ISH4 & CAH1

Over the last few months at the initial Public Hearings and at the most recent Public Hearing, specifically ISH 4 on July 17<sup>th</sup> – Grid Connection, the applicants legal team continued to argue that the consent for the Solar Factor should be consented to well before any potential Grid Connection may be made available. This point has been strongly contested by LCC, NKDC, Scopwick & Kirkby Green Parish Council, Springwell Solar Action Group and Cliff Villages Action Group. It is only the applicant who feels it is reasonable for them to be granted consent even when there is no connection.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/navenby-substation>

**We would also like to draw the Planning Inspectors attention to the fact that National Grid have announced a further delay in their schedule. National Grid are now aiming to submit their planning application to North Kesteven District Council in early 2026. Provided they achieve this milestone it will then need to follow due process and examination. It is very unlikely that this will all be done in 2026.**

It is also abundantly clear there is no Local political desire to have these applications in Lincolnshire, with the Local MP, Grater Lincolnshire Mayor and the head of LCC all vehemently against the application

In an unguarded moment the Applicants legal team finally admitted at the Compulsory Acquisition Hearing 1 on July 17<sup>th</sup>, 2025, that they have been misleading the Planning Inspector, LCC, NKDC and all other interested parties!

The applicant's lawyer's position is fundamentally flawed and clearly inconsistent. At the compulsory purchase meeting on July 17<sup>th</sup>, 2025, he openly acknowledged in discussion with [REDACTED] representative that the applicant could not commit to reducing the amount of land they needed to compulsory purchase because the substation—an **essential component** for the solar application to function—had not yet been submitted or granted planning permission. As a result, they **were not able** to confirm the location of the substation. [REDACTED] representative was unwilling to accept that such a large section of their farm needed to be compulsory purchased when in effect a very narrow corridor for cabling was required. Yet, the applicant's lawyer over the previous few days and at the first set of issue specific hearings argues that planning permission should nonetheless be granted for the Springwell solar application, despite the substation still lacking approval or even being submitted to the planning team yet.

**This contradiction undermines the credibility of the argument for the solar applications approval. The solar application and the substation are intrinsically linked; one cannot operate without the other. Granting permission for the solar application while its essential infrastructure remains unapproved would be premature and speculative. It effectively places the cart before the horse, relying on an uncertain future outcome to justify a present decision.**

Planning policy requires decisions to be based on **certainty, deliverability, and a comprehensive understanding of the project as a whole**. Without a secured and approved substation, the solar application is not a viable or deliverable scheme. To argue otherwise is to disregard fundamental planning principles and invite decisions based on incomplete or contingent proposals.

#### **Traffic & Transport & Public Rights of Way - Response to ISH4**

It is very clear that the Traffic and Transport plan is not worth the paper it is written on. There are no meaningful penalties for vehicles that breach schedules or routes. It is also very clear that the applicant requires the community to police the policy. How will all vehicles be identified?

The applicant's expert also talks about workers being bussed in and billeted. This would suggest there will be very little local employment which goes against the applicants' own claims about employment of local people. The planning inspector needs to be aware of employment breaches on a EDF site in Anglesey North Wales which was raided by Immigration officers and a significant number of illegal workers were found on the site.

The applicants legal team claiming that the industrialisation of the local countryside could have a positive impact on Tourism numbers is at best disingenuous but more reasonably a disgraceful slur on the local communities.

It was also claimed that the community should not worry if visitor spend declines as this money would be spent in other parts of the county or country. This shows a complete lack of empathy on those, cafes, pubs, restaurants, B&B that rely on spend in this area.

#### **Water Environment - Response to ISH4**

There is clearly no understanding of the fragility of the undersoil clay drainage pipes that help drain the soil particularly in Springwell East. The piling is likely to damage these old pipes and this damage will not be visibly above the ground. The first we will know about it is in a storm when the fields above Scopwick get waterlogged and the ground water causes flooding in the village. The applicant will not take responsibility for this. We have already highlighted the significant impact that 1.5 million solar panels and areas of concrete and hard standing will have on the natural drainage of the land. Even small classroom-based studies show there is an impact. This will only be multiplied when done on such a large scale.

We have also highlighted the very real issue of water contamination. The applicant has not provided any reassurance that contamination can't enter the Lincolnshire aquifer. Fire water remains a significant risk factor, and we see no means of the entire BESS site being bunded. Without Bunding then the aquifer is at real risk. The applicant's expert on fire is dismissive of this and made comments referring to those who were concerned about the BESS as "flat earthers". These are real people who care deeply about their communities.

#### **Landscape & Visuals – Response to ISH2**

Springwell Solar Farm Ltd.'s selective use of imagery in its public materials — particularly showing mitigation landscaping that obscures solar panels, while omitting any visual representations of Battery Energy Storage Systems (BESS), inverters, or substations — raises serious concerns from a transparency and community impact perspective.

##### **1. Lack of Full Disclosure = Misleading Representation**

By focusing visuals solely on how the solar panels will be screened with vegetation or landscaping, the company appears to be managing public perception — showing only the “least offensive” elements of the development. This is misleading, especially when more visually and environmentally contentious infrastructure like BESS containers, inverters, or substations are left out of public-facing imagery.

This is extremely concerning and matters: -

Why it matters:

- BESS units can be large, industrial-looking containers often surrounded by fencing and cooling systems.
- Substations and inverters can involve substantial hard infrastructure with noise, lighting, and electromagnetic fields.
- Residents care about all infrastructure impacts, not just the solar panels.



**The applicant states they will need up to 1300 BESS Containers. In this illustration there are approximately 100. Can you imagine the scar on the landscape of 1300**





Why is the applicant deliberately withholding images from the public and the Planning Inspector? The images above are very much what the people of Navenby and the home owners of Toll Bar equestrian farm will see on a daily basis.

## 2. “Mitigation” Renderings Are Selective

The landscaping renderings often show a future, matured vegetation screen — years after installation — conveniently masking the panels and making some very optimistic assumptions on plant growth and ignores the impacts of lack of vegetation in the winter months.

- There are no equivalent current or future-state or construction-stage visuals for the more intrusive BESS and substations.
- There is a presumption that mitigation will be effective, without photographic evidence or accurate before-and-after photomontages.

Why it matters:

- Visual impact assessments must account for all visible elements from sensitive viewpoints, not just the panels.
- Omitting BESS/inverter visuals downplays the real change to the landscape. This is very evident from Inspection point 2 (EN010149/APP/6.4) Toll Bar Cottage – Equestrian facility

## 3. Noise and Safety Impacts Are Visually Absent

Unlike solar panels, BESS and inverter stations introduce:

- Audible noise
- Security fencing and CCTV
- Fire risk, particularly for lithium-ion storage

Yet there are no visuals to help residents or stakeholders understand their proximity or design.

This is really concerning as it demonstrates that the applicant is avoiding being transparent to the local communities. Why it matters:

- BESS units have been known to fail catastrophically; hiding them visually may also downplay legitimate safety concerns.
- Substations are large and may require transformers, creating noise pollution — which should be disclosed visually and acoustically.

## 4. Skewed Planning Consultation

If Springwell Solar Farm Ltd omits BESS and substation images from consultation materials (website, exhibitions, or planning documents), it undermines informed consent and community engagement. Our communities do not realize the full scale or nature of the infrastructure being imposed on the landscape.

Why it matters:

- Planning is a democratic process.
- Without complete visuals, public objections may be muted or misdirected.

The Planning Inspector must consider Double Standard in Visual Impact Methodology

The visual impact methodology used to justify solar panel mitigation should apply equally to all ancillary infrastructure. The failure to model or photomontage BESS or substations suggests either:

- The Applicant knows these would cause alarm or objection
- Or they haven't properly assessed their visual impact
- Either case is professionally questionable.
- In conclusion, the selective visual omissions further undermines trust in the applicant. The applicant is only showing elements of the development that they consider to be less harmful to the Landscape and Communities.
- Springwell Solar Farm Ltd.'s apparent avoidance of visual transparency for key infrastructure components (BESS, inverters, substations) is an attempt to sanitize the project for public and planning approval.

### **Glint & Glare - Response to ISH2**

The applicant has finally acknowledged that the Springwell Solar development is likely to have an impact on Glint & Glare. However once again they are only identifying a limited area of concern. The airstrip on Rowston Top has been identified by the CAA and they state no infrastructure should be within 1000m of this facility. The applicant is ignoring this. Why?

The section along the A15, the applicant is planning on putting construction hoarding for approximately 700 metres to mitigate Glint & Glare. The hoarding will be in place until the planting has achieved a desired mitigation height. This is likely to be around 10 years in favourable conditions. The hoardings will be an eyesore and is very likely to attract vandals and graffiti. This will have an even bigger impact on the visuals in the area.

There is now clear evidence of the impact of large solar facilities impacting pilots. In early 2025, Schiphol Airport in Amsterdam faced a significant safety issue due to glint and glare from a nearby solar farm, the Groene Energie Corridor, which led to runway closures, legal action, and operational disruptions.

Pilots reported being temporarily blinded by intense sunlight reflections from the solar panels during critical landing phases. The solar farm spans 100 hectares and was built with standard anti-reflective glass, which proved inadequate for an airport-adjacent location.

Schiphol Airport filed a lawsuit against the solar farm's owners on June 28, 2025, demanding panel removal due to the "unacceptable safety risk, A Dutch court ruled that a third of the 230,000 solar panels must be removed to protect pilots from glare.

Why is it deemed acceptable that our communities should tolerate the risk of pilots in fast jets experiencing glint and glare?

### **Cumulative Effects - Response to ISH3**

We have highlighted that the Planning Inspector needs to consider all of the applications that are currently lodged on the TEC register against the potential Navenby Substation. We have been clear that there will be considerable opposition to the Substation application and there is no guarantee that this will be consented to. However, the inspector needs to consider what this would do to this beautiful part of Lincolnshire. If consented approx. 10,000 acres would be destroyed, the impact on approx. 10 villages would be significant and no matter how much the applicant attempts to determine 40 years as temporary it will destroy this area for a lifetime.

## Air Quality inc BESS - Response to ISH3

The comments from the applicants BESS expert should be seen as biased. This expert is predetermined in his approach to BESS safety and has a financial vested interest in the application being consented. We would ask that the Planning Inspector also reviews papers written by those with no financial involvement in the Springwell Solar Application. For Example, RICHARD DUNBAR - PARK LODGE INTERNATIONAL LTD

### He states the following:

Placement and spacing of BESS Units

- Unit Separation: A minimum separation of 6 metres shall be maintained between units. This distance may be reduced to 3 metres where an effective fire spread mitigation system (e.g., water curtain) is implemented and approved by the local fire authority.
- Exclusion Zones: **No unit shall be sited within 5 miles of a town or village.** A minimum distance of 1 mile shall be maintained from any residential property. **A buffer of 10 miles shall be observed from any school, educational institution, or medical facility.**

None of the above has been recommended by the applicants BESS expert!!!

We would also encourage the Planning Team to review articles from the Clean Energy Associates. This group highlight some significant and disturbing quality issues.

<https://www.cea3.com/cea-blog/most-common-bess-manufacturing-defects-of-2024>

## Climate Change - Response to ISH 3

Greed vs Need

The Applicant claims 9.6 million tCO<sub>2</sub>e savings across the life of the proposed development. Notwithstanding the Secretary of State has stated a Combined Cycle Gas Turbine an inappropriate baseline for comparisons, this Applicant continues to pursue this line.

The Applicant states: “...*the benefit of the Proposed Development with regards to climate is to replace the electricity generation from fossil fuels.*” The Government’s Net Zero targets are 50% fossil fuel energy by 2030 and a total fossil fuel free grid by 2050. The whole net zero plan will not fail if this proposal is refused; indeed, if the proposed development did not go ahead, an alternative source of renewable energy would take its place NOT fossil fuel generated energy. The Applicant has compared Springwell emissions to fossil fuel emissions across 40 years but the Government target only allows 50% fossil fuel for the first 20 years, ie 25% of the total 40 years. Therefore only 25% of the Applicant’s fossil fuel emission figures should be applied. This immediately reduces the Applicant’s savings claim down to 2.4 million tCO<sub>2</sub>e.

Appendix 2 to Response to Deadline 1 Submissions, is a Climate Technical Note in which the Applicant lists the estimated lifetime GHG intensities for Springwell Solar Farm, a Combined Cycle Gas Turbine, Solar (roof & utility), nuclear, hydropower, onshore wind & offshore wind so has made a comparison. The Applicant’s own figures (in para 1.4.2 Table 2) show Springwell to have the second worst lifetime emissions produced after a Combined Cycle Gas Turbine. The figures stated for a lifetime GHG intensity comparison are **84.1 (these figures are all**

**gCO<sub>2</sub>e/kWh**) for Springwell Solar Farm against **490 gCO<sub>2</sub>e/kWh** for a Combined Cycle Gas Turbine but this needs to be divided by 4 to reflect the 25% use of fossil fuel across the 40 years ie **122.5 gCO<sub>2</sub>e/kWh** a saving intensity of **38.4 gCO<sub>2</sub>e/kWh** (in reality this figure will be significantly less as fossil fuel generation will ramp down across the first 20 years). For the 75%, where the comparison is not with fossil fuels, the comparison can only be with other 'green' energy. Solar is the most polluting of the renewables according to the American National Renewable Laboratory. A Small Modular (nuclear) Reactor, for example, has zero operational emissions, and reported lifetime emissions intensity of **12 gCO<sub>2</sub>e/kWh** (compared to 84.1 for Springwell).

The other issue regarding the proposed development is component replacement. The Applicant assumes the solar PV panels will all last the life of the development (40 years) other than a 5% attrition rate for damage etc. However, most manufacturers suggest a life of 25 to 30 years. Therefore, most likely a replacement of every solar PV panel at least once will be required adding a further one million tCO<sub>2</sub>e to the GHG emissions. Moreover, the Applicant has assumed the life of BESS batteries at 17.5 years and transformers at 40 years. The 2 BESS currently in the planning stage with NKDC, state a battery life of 5-15 years with planned replacements at 10 years and planned transformer replacements at 25 years. Overall, the Applicant appears to have grossly underestimated the carbon emissions attributed to component replacement.

With all this considered the result for the proposed development is a negligible saving in GHG emissions at best yet still more polluting than alternatives such as nuclear or wind. Indeed, it is worth noting that in the recent House of Commons debate (Hansard: Volume 768 debated 5 June 25) Nick Timoney MP, stated that solar is 4 times more carbon intensive than wind and nuclear. He mentioned the Sunnica Solar Farm development in Suffolk, 2500 acres and 3 battery sites, that will increase carbon emissions.

To summarize, the Applicant has underestimated the level of component replacement required and has hugely inflated its project lifetime GHG emissions savings by using a totally inappropriate gas cycle comparison. This project does not accord with the Government's often quoted mantra 'green, home-grown energy'. The proposed development is not green with manufacturing using coal powered energy in China, and clearly not home grown with over 90% of the components coming from abroad.

### **Land Soil & Groundwater - Response to ISH 3**

We have highlighted once again that we feel the assessment of the land quality has been undertaken by a group RSK that is not independent and again has a vested interest in this application being consented. We were lucky to have the knowledge of [REDACTED] who demonstrated that the land being consumed by this application is the very best agricultural land notwithstanding the fact that it also benefits from irrigation. The applicants soil expert attempts to dismiss irrigation. This is non-sensical and again taking people for idiots.

If Blankney Estate was ever to be placed on the open market for sale, one of the key selling points would be the fact it benefits from irrigation pumped from the River Witham. Irrigation **must** be considered. To disregard it would be a deliberate failure to perform due diligence.

As an interested party we respectfully request clarification regarding the land use evidence presented by Mrs [REDACTED] on behalf of the applicant during Issue Specific Hearing 4 (Part 2).



During the hearing, Mrs [REDACTED] on behalf of the applicant stated that “Blankney Estates (BE) wished to retain the farmland north and west of Springwell due to its classification as “good and excellent” agricultural land”. This was cited as a key reason for excluding that area from the proposed solar development, in line with the sequential testing process aimed at minimizing use of Best and Most Versatile (BMV) land.

However, based on our understanding, local knowledge and the applicants assessments of land quality, we believe that the land currently proposed for the Springwell Solar Farm East (which was the land the inspector asked specifically about) which is immediately north of the settlement of Scopwick and poses a potential surface water flood threat to the settlement due to the lack of an adequate drainage system proposed by the applicant— BE has offered these lands for development stating that this land within Springwell East is of an inferior quality than lands they wish to retain on the Lincoln Heath. We believe the land which constitutes Springwell East is of equal or potentially superior agricultural quality compared to the land north and west of Springwell West and Central that they wish to retain. This raises concerns about the accuracy and completeness of the rationale provided The lands they wish to retain to the north and west of the proposed Springwell West and Central developments is the same drought prone heathland and is geographically closer to the proposed Navenby Sub-station, by re-siting Springwell East thus removing any flood risk (being sited on porous sub-soils) and will have less of an impact on far fewer dwellings.

Furthermore, we believe there may be other non-agricultural factors influencing BE’s land selection preferences. Specifically, the land north of the proposed Springwell West and Central is in close proximity to the following: residential dwellings currently occupied by members of the BE owners/directors the Parker Family; at Temple High Grange Farm and Highfield Farm Metherringham); the adjacency to Blankney Golf Course (Family owned – Blankney Grange Farm Blankney); the adjacency to Blankney Model Village (Village Farm Blankney). We respectfully suggest that these proximities may be a more significant factor in BE’s reluctance to release these lands for solar development than soil quality alone.

We request the following:

1. Clarification from the applicant regarding the full criteria used in the sequential testing process, including any consideration of residential and other proximity or estate preferences.
2. Disclosure of comparative soil quality assessments between the proposed Springwell East site and the land north of Springwell West and Central.
3. Confirmation of whether the statement made by Mrs [REDACTED] reflects all relevant factors influencing land selection, or whether additional context should be considered.

We believe this clarification is essential to ensure transparency and fairness of the sequential test rationale in the examination process, particularly given the significant impact this land within Springwell East’s selection will have on local communities and agricultural integrity.

### **Biodiversity - Response to ISH3**

The applicant makes grossly exaggerated claims around BNG. The Planning Inspector pushed on the issue of grazing. The number of sheep required to graze 3300 acres would be significant. It was clear from the applicant that the fields that are covered in panels will be maintained by

chemicals and motorised cutting. This needs to be done to prevent vegetation growing around the panels and infrastructure. There is also the concern around chemical leaching and what impact this could have on limited livestock.

On the ASI visit there was several sightings of Red Kite a a protected species. There is real concern that the panels will have a negative impact of all birds.

Also highlighted is the impact the fencing will have on the deer population. There is no mitigation suggested or acceptable.

### **Population Inc Health & Wellbeing - Response to ISH3**

Many people have highlighted the negative impact this and associated developments will have on our communities. At the Open Forum this was seen very clearly. Whilst distressing it is important that the Planning Inspector recognises that this application is having and will have a hugely detrimental impact on everyone in the villages that are impacted by Springwell Solar and the additional applications which are likely to follow if the Navenby Substation is consented to by NKDC. The applicant has tried at every opportunity to diminish the impact on people and communities. It is the Planning Inspectors responsibility to take on the views of the community and to not simply allow a developer to steamroller across the democratic wishes of the people of NKDC.

### **Other Matters including Waste - Response to ISH3**

The applicant again is being somewhat liberal with the truth. They are stating that over a 40 lifetime only 5% of the panels will need replacing. It was good to see the Planning Inspector call this out and suggest that this was written into the DCO. The applicant was very much against this. We know why, they know that a significant number of panels will need replacing during the scheduled lifetime of the application. As acknowledged by all sources the solar panels degrade on a yearly basis and the efficiency of panels is already sub optimal therefore again it is extremely disingenuous to state that panels won't be replaced during a 40 year period. In addition, all the other BESS application looking to connect into the potential Navenby substation are stating a maximum life of approx. 10 years for a battery. Therefore, conservatively the BESS units will need replacing 3 times.

This will create a significant amount of waste. From what we learned during the ISH 3 there are no facilities to deal with this waste currently and the applicant has no idea who will deal with it. Its essentially a problem for tomorrow and someone else's problem to deal with. The waste resolution should also be factored into the Cumulative Impact.

We have also highlighted on numerous occasions that there are no funds set aside for the decommissioning. We are simply told by the applicant that this is part of the DCO, and any future owners would be obliged to fulfil what is in the DCO. We are not idiots and many of us have years of experience in industry where we have seen large industrial developments collapse where the final owners either vanish or state they don't have the funds to remediate the area. In 40 years, this site will become an industrial wasteland.

**We call on the Planning Inspector to reject this application.**