

Comments on any further information and submissions received at Deadline 2

and

Post-Hearing Submissions

by Anne Heard Interested Party reference 20054475

A. Comments on Springwell's response to Deadline 1 submissions REP2-023

Section 3.2 Response to LCC's LIR and WIR -Table 3-2 Grid Connection LIR 8.7 and 8.8 (and WR)

The Applicant's response:-

- Paragraphs 4.11.8 and 4.11.9 of NPS EN-1 require that in the circumstances that it is not possible to coordinate applications the applicant should "confirm that there are no obvious reasons for why the other elements are likely to be refused". The Applicant is confident that it has addressed these requirements. The national and local planning policies are generally supportive of the application for the Navenby substation on the basis that NGET take a responsible approach to siting, design and mitigation.

-The Grid Connection Statement has been amended to reflect the revised connection dates (REP1-058)

-There is no evidence to suggest that the Navenby substation will not come forward. The National Grid TEC Register shows connection offers up to 4.2GW at Navenby substation.

Comments: -

All of the 11 applications for solar farm DCOs that have been granted by the Secretary of State included a connection into the electricity grid via existing electricity substations. Of the remaining 35 applications for solar farm DCOs currently being processed, 20 are also proposed to connect into existing electricity substations.

Of the 15 applications for solar farm DCOs that are proposing to connect into a new electricity substation, 12 are at pre-application stage and only 3 at examination stage (Springwell, One Earth Solar and Botley West). The Springwell DCO application is the most advanced so this would likely be the first DCO to be granted where there is no existing grid connection.

The Applicant's case is heavily reliant on following precedents set by previous DCO decisions eg in relation to decommissioning bonds REP2-023 page 137 "the Secretary of State has not required a decommissioning bond for the 7 made solar DCOs to date" and in relation to the utilisation of CCGT as a method to determine emissions REP1 071 page 28 "in addition to Gate Burton Energy Park, a number of recently consented developments have utilised the same comparison to CCGT, including Longfield Farm Solar and East Yorkshire Solar". It is surprising to note that in relation to the issue of a grid connection, the Applicant is seeking a DCO that does not conform to the precedent set by previous solar farm orders.

When questioned by the ExA at the ISH4 the Applicant's representative cited the Hinkley Point C New Nuclear Power Station DCO as an example of where the grid connection permission was granted later than the DCO for the substantive development (Part 1 00:27:25:24-00:28:16:11). The Panel's report to the Secretary of State in that case was made on 19 December 2012, at a time when there was no

pressure on the network capacity with no queue of projects waiting for connections to the grid as there is currently. The Transmission Entry Capacity Register (TEC) held by NESO shows that as at 18 July 2025 National Grid had 1310 projects on the register.

At the ISH4 the Applicant's representative cited Ofgem's Connections Action Plan November 2023 as authority for "recognising that there is a need for new electricity substations to come forward in areas where renewable infrastructure is likely to be developed" (Part 1 00:22:30:20-00:23:04:08) which in turn supports Springwell's application. This assertion is incorrect, the Action Plan does not make any mention of building new substations, it sets out to reform the electricity connection process which is backlogged with applications for connection by 1) raising the entry requirements for applications for connections 2) removing stalled projects 3) better utilising the existing network capacity 4) better allocating the available network capacity 5) improving data and processes and 6) developing longer term connection process models.

The Applicant considers that it can confidently state that there is no obvious reason why planning permission for the proposed Navenby substation will be refused on the basis of a sensible approach to mitigation. The Screening Opinion under reference 24/1080/EIASCR dated 15 October 2024 in respect of the proposed Navenby substation sets out the potential impacts of the development. Whilst the screening opinion acknowledges that matters such as the effects of the development on ecology, traffic and transport, air quality, noise and vibration could be mitigated, it highlights a number of potentially significant effects which could not "realistically be mitigated against in the Council's opinion":-

Landscape and Visual- "The extensive nature of the substation and the erection of two additional pylons (which are indicatively noted as being offset/offline i.e not comprising a continuation of the existing linear arrangement of the 400kv circuit) will lead to the increased urbanisation of an otherwise rural landscape as much of the HV equipment will be visible above the existing hedgerows. This is considered to be a potential significant effect".

Archaeology-"The screening matrix identifies that this area has high potential for previously unknown archaeological remains which would be required to be investigated further as a potential significant effect as the remains could be of regional or national importance. It is likely that the impact on previously unknown archaeological remains would lead to potential significant effect".

Agricultural land- "The development would result in the permanent loss of around 11.8 ha of BMV agricultural land which is considered would lead to a potential significant effect due to the extent and high quality (Grade 2) of the agricultural land that would be lost. Whilst some mitigation might be possible by way of the production of a Soil Management Plan the proposed development is not temporary/reversible and there would be no scope for the continuation of certain agricultural practices within the bounds of the application site in the way commonly proposed for solar developments".

Cumulative Impacts-"The primary cumulative impacts arise from landscape character and visual impact stemming from a continuation of urbanising form in a countryside location and visible from a number of locations within an open landscape. There will be further cumulative impact considerations in relation to archaeology and loss of BMV land. The schemes (Springwell, Gorse Hill lane BESS, BESS to the north of Green Man Lane, Navenby) could have impacts on areas and features known for their value in terms of archaeology, landscape value and agricultural quality that would have a significant adverse cumulative effect".

The Scoping Opinion for the proposed Navenby substation was issued by NKDC on 6 August 2025 under reference 25/0699/EIASCO. This reiterates that the combined mass and scale of several energy projects across the region “has the potential to lead to adverse effects on landscape character of the local, and potentially regional, area”. “This would be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing multiple schemes across potentially several kilometres, albeit with gaps between some of the projects. However, repeated views and presence of large scale solar would combine over time to create a greater perception of change”. With regard to the impact on BMV agricultural land the Opinion sets out that “it is likely that much of the site will be BMV quality land and the loss will be permanent with sealing over any soil resource”.

The Applicant has failed to acknowledge that these environmental impacts may tip the planning balance against the granting of planning permission for the Navenby substation.

The Applicant states that it has revised its Grid Connection Statement to reflect the revised connection dates (REP1-058). In paragraph 2.1.2 of the Grid Connection Statement the Applicant states that it has a grid connection offer with National Grid to export 800W(AC) of power to the grid. At paragraph 3.1.3 the Applicant states that there will be a 50:50 split of capacity between two connection dates in October 2029 and October 2030 and refers to this information being available to view on the TEC Register. However, the TEC register shows a further 800MW connection project for Springwell to connect to Navenby substation on 1 June 2033. This is not explained or reflected in the Grid Connection Statement. The National Grid website for the Navenby Substation states that the planning application has been pushed back until early 2026, doubtless the Grid Connection Statement will need to be further revised to reflect this.

The Applicant says that there is no evidence to suggest that the Navenby substation will not come forward and that the TEC Register shows connection offers up to 4.2GW at Navenby substation. The following projects for connection to the Navenby substation are at **scoping** stage on the TEC register:-

Cliff Hill Energy Farm	800 MW
Cranwell Solar and BESS farm	300MW
Denton Estates Solar PV and BESS	129 MW
Ewerby (Leoda)	500MW
Housham PV and BESS (Fosse Green)	240MW
Nat Power (Coleby BESS)	1030MW
Navenby GEC (Ethos Green)	580MW
Springwell	1600MW
<u>Total</u>	<u>4179MW</u>

Of these 8 projects:-

2 are at pre-examination stage (Fosse Green and Leoda) for a DCO application

Coleby BESS is subject to a current application to NKDC for planning permission (25/0533/FUL), however the application does not include the grid connection cable corridor which is stated will be

the subject of a separate planning application which has not been submitted. There are 435 objections to the proposed development.

It is difficult to identify the remaining proposals with the details provided. I assume that one of them relates to the BESS to the south of Green Man Lane, Navenby which is subject to a current planning application (25/0491/FUL). There are 308 objections to the application.

One of the other projects may relate to the Gorse Hill BESS, Navenby Heath in respect of which an EIA screening opinion has been issued by NKDC (24/0075/EIASCR).

None of these projects have consent for development. In REP1-092, NGET have commented that other developers have requested connection into the proposed Navenby substation. NGET says "If the new power connections are not required or are no longer needed, the necessity for the substation would be assessed". NGET will need to make a commercial decision as to whether to proceed with the Navenby substation, especially if planning permissions for other projects elsewhere in the country come forward before the proposed developments that are planned to connect to the Navenby substation. The decision whether to proceed with building the substation, even if planning permission was to be granted for it, is a matter for NGET and outside the control of the Applicant. It is noteworthy that no representative from National Grid attended any of the Issue Specific Hearings to support the application for the Springwell DCO.

Paragraph 19 of the Planning Act 2008 – Guidance relating to procedures for the compulsory acquisition of land- Sept 2013 states that:-

"The high profile and potentially controversial nature of major infrastructure projects means that they can potentially generate significant opposition and may be subject to legal challenge. It would be helpful for applicant to be able to demonstrate that their application is firmly rooted in any relevant national policy statement. In addition, applicants will need to be able to demonstrate that any potential risks or impediments to implementation of the scheme have been properly managed..."

The potential risk to the proposed development is that planning permission will not be granted for the Navenby substation and/or that NGET decides not to proceed with the construction of the substation eg if planning permissions/ DCOs are not forthcoming for the other proposed connections. The Applicant is not able to comply with the above CPO guidance as these risks are completely out of their control and therefore cannot be managed.

Section 3.3 Response to LCC's responses to ExQ1-Table 3.16 Response to LCC's Responses to ExQ1 LCC 1.13.3 A15/B1202 Junction improvements and LCC 1.13.7 and 1.13.8 -Construction traffic routes and movements

The Applicant's response:-

-The Applicant has agreed with LCC that in response to LCC's concerns about traffic impact at the A15/B1202 junction, staff movements through the junction will be subject to an embargo between 0700-0900hrs and 1600-1800 hrs and during those hours no more than 20 HGV movements will be permitted

-The outline Construction Traffic Management Plan (oCTMP) REP1-062 includes measures to restrict construction traffic to agreed routes

- The oCTMP includes measures to monitor and enforce these measures

Comments:-

Paragraph 4.1.9 of the oCTMP acknowledges that “it is difficult to control worker movements”.

Section 8.4 of the oCTMP sets out the enforcement measures proposed which are that the restricted routes will be recorded on a map and communicated to all drivers, sub-contractors and suppliers. Any non-compliance of vehicle routing should be reported by local residents and any breaches will be enforced through contractual arrangements. At the ISH4 the Applicant’s expert stated that the movement of HGV would be monitored by the contractor by the use of GPS trackers (Part 1 01:07:20:02-01:07:43:24). However, there is no mention of this requirement in the oCTMP.

It is not proposed in the oCTMP that the applicant or its contractors will be taking any measures themselves to monitor traffic along the proposed routes or to monitor other routes to determine compliance with the vehicle routing provisions including the embargo at the junction of the A15/B1202. Whilst the movement of HGVs can be monitored by trackers, this will not apply to other commercial and private vehicles travelling to and from the various construction sites. I question how members of the public are to be expected to report breaches of the routing provisions, as the Applicant suggests, as they will have no knowledge of which vehicles are Springwell workers, contractors etc.

As currently drafted, there is a vague requirement in paragraph 8.3.4 of the oCTMP for the principal contractor to collect data, however the onus (and cost) is on the relevant planning authority (LCC) to take steps to monitor traffic routes and obtain information from the contractor in order to check compliance with the routing provisions. I suggest that the oCTMP is amended to require the Applicant to provide such information to LCC as it may require in the form of quarterly reports to demonstrate compliance with the routing provisions. (There is a precedent in the Sunnica DCO for such a reporting mechanism in paragraph 6.2 of the draft Decommissioning Environmental Plan).

Section 5.3 Responses to Category 2 Stakeholder Submissions 5.3 Responses to Category 2 Stakeholder Deadline 1 Submissions Table 5-1 Ashby de la Launde and Bloxholm with Temple Bruer and Temple High Grange Parish Council and Table 5-4 Scopwick and Kirkby Green Parish Council
Contamination from solar panels

The Applicant’s response:-

-Maintenance operations will ensure that no chemicals or heavy metals will be released from within the panels

-Any damaged panels would be removed and replaced in accordance with the oOEMP (REP2-018)

Comments:-

The only references to the maintenance and repair of the solar panels is Table 1 of the oOEMP where a set of process tasks includes “regular site inspections”. Paragraph 2.10.1 of the oOEMP states “any equipment that needs to be replaced during the operational period will be disposed of following the waste hierarchy with materials being re-used or recycled wherever possible”. Paragraph 2.4.3 states that there will be up to 24 permanent staff on site during the operational period with additional workers being brought onto the site when required for maintenance, replacement of solar

equipment, vegetation management and cleaning. This suggests that the inspection of the solar panels will be carried out by the permanent staff.

The Applicant appears to accept the point that solar panels contain chemicals and heavy metals that can leach into the soil. The United States Environmental Protection Agency website (accessed 26/7/25) states “Hazardous waste testing on solar panels in the marketplace has indicated that different varieties of solar panels have different metals present in the semiconductor and solder. Some of these metals like lead and cadmium are harmful to human health and the environment at high levels”. In “Assessing soil pollution concerns in proximity to fence-type solar photovoltaic system installation” (Hasnain Yousuf *et al* in Heliyon May 30 2024 (accessed 26.7.25)) it is stated that metals such as aluminium and steel commonly employed with the use of PV materials in PV structures may lead to environmental and soil contamination by leaching into the soil. Additionally, water run-off may carry pollutants into surrounding soil and water bodies. PV installations undergo aging and degradation processes over time due to various environmental factors. Long term exposure to sunlight, temperature variations and other environmental conditions can have an impact. Physical damage to solar panels such as breakage or fractures can result in the release of materials including metals into the surrounding environment. Accidental events such as severe weather conditions may also lead to damage and potential metal release. An example of this is the storm damage caused to hundreds of solar panels at the Applicant’s solar farm in Porth Wren on 10 December 2024 (Wales Online 11 December 2024).

The Applicant has failed to provide any level of detail about how frequently the solar panels will be inspected. Assuming that the panels will be inspected on a weekly basis, this means that, given there are 1.5 million solar panels (paragraph 3.4.8 of Vol 1 ES Proposed Development Description APP-043) constructed across 1280 ha, each of the 24 members of staff during a five-day working week will have to inspect 12,500 solar panels each day ($1.5M \div 24 \div 5$). This appears to be a physical impossibility. It is unlikely that at any time all 24 members of staff will be present due to sickness, holidays etc or that all 24 staff will be employed to check solar panels. How is the Applicant able to ensure that the panels are “regularly inspected” other than by having either considerably more permanent staff on site or considerably less frequent inspections than once a week? In either scenario there will be environment impacts either from increased traffic and noise from contractors or pollution from damaged solar panels which have not been replaced.

The Applicant has indicated a service life of the solar panels as 40 years (Table 8.5 Vol 8 Climate Change ES (APP-048)). However, the United States Environmental Protection Agency website referred to above states that “silicon solar (mono-and poly-crystalline) represent over 95% of solar panels sold today. They have long life times, with modules expected to last for 25 years or longer.” In “PV recycling: where do all the panels go?” (E Matthews (2018) in ReNew Technology for a Sustainable Future) it is stated that “each solar panel has an approximate lifespan of 25-30 years”.

The Applicant has asserted that only 5% of the 1.5M solar panels will be replaced over the lifetime of the project which will cover 0.5% for replacement and 0.2% for construction breakages (Response to Deadline 1 Submissions Table 3-12 LIR 18.25-18.26 (REP2-023)). At the ISH3 (Part 2 00:45:42:21 onwards) in response to the ExA question, it is noted the Applicant was not prepared to accept a restriction of 5% replacement solar panels to be included in the DCO. Hardly surprising in light of the minutes of the Sutton Bridge Solar Farm Community Liaison Group on 30 November 2022 (EDF website) when in response to a question about the likelihood of panels being changed within the 40 years, an EDF representative replied that “with technology advancing fast enough that this was a potential”.

Even if all the proposed solar panels will not deteriorate and require replacement within the 25-30 years as suggested by the authors above or advancing technology would require them to be replaced, then on the basis of the Applicant's estimate, 5% of the 1.5 million solar panels equates to 75,000 panels that will need to be replaced, so on average 36 panels will need to be replaced each week. The panels each measure 2.4m by 1.3m by 30-40 mm deep (paragraph 3.4.6 of Vol 1 ES Proposed Development Description) and weigh 18 kg (E Matthews cited above). Will the damaged panels be immediately dismantled so as to prevent leaching of contaminants into the soil? If so, where will they be stored? If the damaged panels remain in situ until replacement panels can be installed, how long will it take to replace the panels? After the storm at Porth Wren on 10 December 2024, an EDF spokesperson said that the damaged panels would not be replaced until early 2025 (New Civil Engineer - online accessed 26.7.25).

The Applicant has pointed out its experience and knowledge of developing solar farms (paragraph 2.1.3 of the Funding Statement APP-016) and yet their projects to date have been small scale solar farms in the UK (under 50MW) and France (the largest is Toul-Rosières solar park at 115 MW on 367 ha of land). Given that the Applicant does not appear to have operated a solar farm of the scale proposed at Springwell, what confidence can the public have that the Applicant will be able to manage the Springwell site so as to minimise environmental impacts especially given the lack of details in the plans which it has submitted so far? The minutes of the meeting of the Community Liaison Group on 23 April 2024 at the Applicant's Tye Lane Solar Farm development (published on EDF's website) are a worrying portent of things to come:- "The group reminded MC (the Construction Manager) that currently the project has felt like a catalogue of mistakes one after another with one thing said and another done".

Section 5.3 Responses to Category 2 Stakeholder Submissions 5.3 Responses to Category 2 Stakeholder Deadline 1 Submissions Table 5-4 Scopwick and Kirkby Parish Council Decommissioning costs

The Applicant's response:-

-The Applicant will set aside funds during the operation of the scheme to meet the costs of decommissioning.

- A decommissioning bond has not been required for the 7 made solar DCOs to date. In Cleve Hill, the ExA noted that the Applicant intended to set aside funds during the lifetime of the scheme and reference is made to Mallard Pass where the Secretary of State considered that there was no need for further controls.

Comments:-

The Applicant's representative at the ISH3 asserted that the Funding Statement required under Regulation 5 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 is a requirement to show how the Applicant will fund acquisition, not decommissioning (Part 4 00:56:59:21-00:57:36:07 and 00:57:36:18 – 00:57:44:22). This assertion is incorrect. I have already addressed this point in my submission at REP2-027. Paragraph 5(2) (h) of the Regulations requires "if the proposed order would authorise the compulsory acquisition of land or an interest in land or right over land, a statement of reasons and a statement to indicate how an order that contains the authorisation of compulsory acquisition is to be funded".

Paragraph 17 of the “Guidance related to procedures for the compulsory acquisition of land” DCLG Sept 2013 says that the funding statement “should provide as much information as possible about the resource implications of both acquiring the land and implementing the project for which the land is required”. The funding statement should therefore show that the project is viable. As the project includes decommissioning (as defined in paragraph 1.2.2 of the Funding Statement (REP1-011)), the Funding Statement should identify how those costs will be met. For example, paragraph 2.2.1 of the Funding Statement for Tillbridge Solar states that decommissioning costs will be covered by an agreement with the landowner to create a form of security to ensure that there are funds available for decommissioning. In Oaklands DCO the Funding Statement (APP-020) stated that the pre-application costs had been funded from the applicant’s balance sheet and that “this model will continue to apply through the DCO determination period, construction, operation and ultimately decommissioning of the Proposed Development”. Whatever the method of funding the decommissioning costs, the Funding Statement should be amended to reflect this.

At the ISH3 the Applicant’s representative cited Cleve Hill Solar as authority for his assertion that policy does not require a decommissioning bond to be provided (Part 4 00:54:00:02-00:54:32:12). In Cleve Hill solar DCO the ExA report dated 28 February 2020 noted at paragraph 12.3.50 that the applicant intended to follow good commercial practice to set aside funds during the operational life of the project and stated that “without clear precedent or government guidance, we see no basis to justify a financial bond secured by a requirement in the DCO”. The ExA was concerned with a lack of policy or precedent to guide the panel, rather than, as the Applicant infers, that policy states that there is no requirement for a bond.

As the representative from NKDC pointed out at the ISH3 (Part 4 00:53:03:11 -00:53:50:08), there is an example of a requirement for a decommissioning bond in the draft DCO for Helios Renewable Energy Project dated 27 May 2025 where paragraph 5(3) of Schedule 2 states:-

“No later than year 15 of operation the undertaker must notify the local planning authority that the undertaker has put in place the requisite decommissioning security in the form as required by the landowners”

The Applicant’s representative at the ISH3 also cited the Sunnica Solar farm DCO as a precedent where a decommissioning bond was not required (Part 4 01:00:59:24 – 01:01:26:19). In that case a number of IPs had raised the issue about the applicant’s ability to fund the full costs of delivery of the project including decommissioning. In the Recommendation Report dated 12 July 2024, at paragraph 7.5.123 the ExA cited the recommendation of the ExA in the Cleve Hill solar DCO not to require a bond and noted that “the Applicant confirmed that the decommissioning costs will be included as an operating liability ie the operator will set aside funds during the operation of the proposed development to meet the cost of decommissioning as a term of the relevant requirement in the Decommissioning Environmental Management Plan which will be enforceable at the time of decommissioning”.

If the ExA is not minded to require the Applicant to provide a decommissioning bond or security as part of the requirements of the DCO then I suggest that, as the Applicant is now proposing to include the decommissioning costs as an operating liability, that a requirement to include an index-linked Provision in the undertaker’s accounts to cover the costs of decommissioning is included as an enforceable provision in the DCO.

The Applicant's response:-

The effects on the Temple Bruer Preceptory church tower are agreed with Historic England (HE), LCC and NKDC as detailed in REP01-066, REP01-077 and REP01-078.

Comments:-

In my Deadline 1 submission (REP1-115) I expressed the view that the Temple Bruer Preceptory Church, a Scheduled Monument and Temple Bruer Preceptory Church tower, a Grade I Listed Building should have been scoped into the ES. In response the Applicant has referred to the agreed draft Statements of Common Ground with HE, LCC and NKDC.

Table 2 paragraph 2.4 of the draft Statement of Common Ground with HE (REP1-078) which has been marked as "agreed" states that HE "have reviewed the setting impacts of highly graded designated heritage assets. HE are content that the design work has drawn back the arrays and other visual intrusions associated with the scheme such that harm to any significant degree is designed out (in terms of immediate visual/landscape setting)". No specific mention is made of the Temple Bruer Preceptory Church Scheduled Monument and Grade I listed building.

The draft Statement of Common Ground with NKDC (REP1-077) Tables 11-1 and 11-2 expresses a general concern by NKDC about the approach to above ground heritage assets. This matter is marked as under discussion, it is not agreed as the Applicant states.

The draft Statement of Common Ground with LCC (REP1-066) page 28 Table 5-2 is also still marked as under discussion, not agreed as the Applicant states. LCC was concerned with the exclusion of listed buildings within the 1km study area including "Temple Church Tower (Grade I) and Temple Farmhouse (Grade II)". The note goes on to say that further discussions with the Applicant on 2nd and 30th April have resolved a number of issues, this includes inter alia, Temple Church Tower and Temple Farmhouse. No details of those meetings are given. In response the Applicant refers to Temple Farmhouse and it is only in the context of the comments about the Farmhouse that the Applicant says that the Proposed Development "will not impact on the prominence of the tower which will continue to be experienced within the farm complex, the change to the wider surroundings beyond the areas where the tower is appreciated are considered to result in a negligible impact to its significance which is not significant. These assets were therefore scoped out of the ES".

Paragraph 5.9.10 of NPS EN1 requires that as part of the ES the applicant should provide a description of the significance of the heritage assets including any contribution made to their setting. The level of detail should be proportionate to the importance of the heritage assets. In paragraph 5.9.12 the applicant is required to ensure that the extent of the impact on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. As the Applicant has failed to properly describe and assess the impact of the proposed development on the Temple Bruer Preceptory Church Tower Grade I Listed Building and Scheduled Monument in the light of the information which I provided in REP1-115, I have commissioned a report from Guy Taylor Associates to carry out such an assessment, a copy of which is included with these submissions. A copy of the report has been sent to HE, LCC and NKDC.

B. Post-Hearing Submissions

ISH2 Agenda item 5.2 Noise from construction and operation along ProW

In terms of assessment of the visual impact of the proposed development, the sensitivity of the receptor group being ProW between Blankney, Scopwick and Kirkby Green was assessed as high/medium by the Applicant (Table 10.10 of Chapter 10 Vol 1 ES Landscape and Visual refers). At the ISH 2 the ExA questioned why, when in terms of visual assessment, the users of PROW are considered by the Applicant to be high/medium receptors, in terms of noise assessment, the Applicant has considered that they are not sensitive to noise impacts (Part 3 00:47:56:20).

In response, the Applicant's expert stated that if you were to identify the ProW as high sensitivity "the only item you could look at is the World Health Organisation guidelines which look at outdoor spaces. So, for any outdoor fixed space, such as a garden or a balcony, you would apply an upper limit of 55dB as a good environmental standard" (Part 3 00:48:10:02). "And if we applied that to the ProW, the 55 dB limit would apply and we've predicted to be across all ProW through operation to be below the 55." (Part 3 00:48:43:17).

The figures referred to by the Applicant's expert from the World Health Organisation "Guidelines for Community Noise" (1999) are set out in Table 1 of the guidance:-

Table 1: Guideline values for community noise in specific environments.

Specific environment	Critical health effect(s)	L _{Aeq} [dB(A)]	Time base [hours]	L _{Amax} fast [dB]
Outdoor living area	Serious annoyance, daytime and evening Moderate annoyance, daytime and evening	55 50	16 16	- -
Dwelling, indoors	Speech intelligibility & moderate annoyance, daytime & evening	35	16	-
Inside bedrooms	Sleep disturbance, night-time	30	8	45
Outside bedrooms	Sleep disturbance, window open (outdoor values)	45	8	60
School class rooms & pre-schools, indoors	Speech intelligibility, disturbance of information extraction, message communication	35	during class	-
Pre-school bedrooms, indoor	Sleep disturbance	30	sleeping-time	45
School, playground outdoor	Annoyance (external source)	55	during play	-
Hospital, ward rooms, indoors	Sleep disturbance, night-time Sleep disturbance, daytime and evenings	30 30	8 16	40 -
Hospitals, treatment rooms, indoors	Interference with rest and recovery	#1		
Industrial, commercial shopping and traffic areas, indoors and outdoors	Hearing impairment	70	24	110
Ceremonies, festivals and entertainment events	Hearing impairment (patrons:<5 times/year)	100	4	110
Public addresses, indoors and outdoors	Hearing impairment	85	1	110
Music and other sounds through headphones/earphones	Hearing impairment (free-field value)	85 #4	1	110
Impulse sounds from toys, fireworks and firearms	Hearing impairment (adults) Hearing impairment (children)	- -	- -	140 #2 120 #2
Outdoors in parkland and conservation areas	Disruption of tranquillity	#3		

#1: As low as possible.

#2: Peak sound pressure (not LAF, max) measured 100 mm from the ear.

#3: Existing quiet outdoor areas should be preserved and the ratio of intruding noise to natural background sound should be kept low.

#4: Under headphones, adapted to free-field values.

The 55dB LA_{eq} (16h) level quoted by the Applicant's expert is the level at which serious annoyance, daytime and evening will be experienced in an outdoor living area, such as a garden or balcony. At levels of 50dB LA_{eq} (16h) there would be moderate annoyance. The Applicant failed to mention that the guidance states that outdoors, in parkland and conservation areas (which more closely aligns with the ProW than a garden or balcony setting), the adverse health effect from noise is the "disruption of tranquillity" and that "existing quiet outdoor areas should be preserved and the ratio of intruding noise to natural background sound should be kept low".

Figure 12.3 of Vol 2 ES Noise (APP-068) gives the specific noise levels during operational phase of development in the area of the ProW to the north of Scopwick and these range from 35 dBA to 50 dBA. No baseline background levels were taken on the ProW by the Applicant which can be used to assess impact of the noise from the development. However, applying the WHO guidelines in relation to outdoor areas in parkland, the noise levels of 35dBA to 50dBA that will be experienced on the ProW network will be above the natural background noise levels and there will therefore, according to the WHO guidelines, be an adverse impact from operational noise on the users of the ProW.

In relation to the construction phase of the proposed development, the Applicant's expert said that there are too many variables to set a noise level at which it would be assessed as having an adverse impact, because not only is the noise from the construction mobile but so are the users of the footpaths (Part 3 00:43:19:10). This clarifies the Applicant's response to ExA Q1.11.4 where the Applicant stated that there was no specific guidance which identifies applicable noise criteria for ProW due to the exposure of noise being temporary (REP1-071). As I set out in my submission at REP2-027 the lack of guidance is not a reflection that there is no impact but rather as set out on paragraph 2.22 of Noise Policy for England (March 2010) it is not possible to have a single objective noise-based measure that defines SOAEL (Significant Observed Adverse Effect Level) that is applicable to all sources of noise in all situations.

The Applicant says that there is no difference in magnitude or tonal characteristics between the noise from construction traffic such as dumpsters and from agricultural vehicles such as combine harvesters (Part 3 00:57:02:04 and 00:57:59:10). One or two workers would be in a field operating agricultural machinery for around an hour for each of about 7 activities across the seasons in a year, eg ploughing, harrowing, drilling, spraying, harvesting, baling and hedging. Compare this with construction activities from the proposed development which will be taking place 12 hours a day for 5.5. days a week for two years with between 400 and 650 staff (Proposed Development Description vol 1 Chapter 3 ES APP-043).

Whilst most agricultural activities involve one vehicle, on every task listed in the Tables 1 to 11 of Appendix 12.2 Construction Noise Plant Tables and Results (APP1-121 Vol 3 ES Chapter 12 Noise) there are between 4 and 11 different types of plant and machinery operating at the same time. In "Effects of acoustic characteristics of combined construction noise on annoyance" (Sung Chan Lee *et al* In Elsevier Vol 92 October 2015) the study examined the effects of the acoustic characteristics of combined construction noise on annoyance using six construction machines including pile drivers, bulldozers and excavators. The results showed that the annoyance caused by combined noise was significantly higher than the annoyance caused by noise from an individual machine when L_{Aeq} increases over 65dBA.

The Applicant's assertion that noise levels from construction and agricultural vehicles which would be experienced by the users of the ProW are comparable does not take into account the length of time that the construction plant and machinery would be on site or that the combination of a number of different types of construction vehicles working at the same time will have a significantly higher "annoyance" factor than a single agricultural machine.

In considering the impact of noise from the construction activities, it is not just absolute noise levels that should be taken into account. The WHO guidelines referred to above say that "noise can produce a number of social and behavioural effects as well as annoyance. Annoyance in population varies not only with the characteristics of the noise, including the noise source, but also depends to a large degree on many non-acoustical factors of a social, psychological or economic nature".

Surveys show that construction noise has a high annoyance factor (Alexis Pinsonnault-Skvarenina *et al* "Construction noise annoyance and its evolution: Insights from the Turcot Project longitudinal study" In Journal of the Acoustical Society of America Vol 157 Issue 5 May 2025). On the other hand, noise can have positive psychological associations for example sounds from combine harvesters can evoke a sense of abundance, the culmination of a farmer's year-long effort, a time of plenty and food security, a sense of the natural order and passing of the seasons. There are many references in art to such farming activities as being a positive experience, for example "We plough the fields and scatter", a German hymn associated with harvest and the poem "The Harvest Morning" by John

Clare (1793-1864). In art, Vincent van Gogh's "The Harvest" and "The Harvesters" by Pieter Bruegel the Elder celebrate this farming activity.

In conclusion, both noise from construction activities and subsequent noise from the solar equipment will have a significant adverse impact on the users of the ProW within the proposed development area.

ISH 3 Agenda Item 6.6 "The matters associated with the management of firewater during a thermal runaway event at the BESS to be discussed with the Applicant and the EA"

In response to this question, at the hearing the Applicant's representative stated that at a meeting with the EA on 3 July 2025 all matters set out on the draft Statement of Common Ground with the EA (REP1-080) had been agreed (Part 3 00:42:02:11- 00:42:32:17). (This includes at item 2.8 of the Statement of Common Ground the request by the EA to be a consultee on the drainage strategy as well as the Battery Safety Management Plan).

When asked to confirm this by the ExA (Part 3 00:45:38:12 -00:46:07:00) the representative of the EA said that as they were not present at that meeting they "didn't know" but went on to suggest that as the EA were to be a consultee on the detailed Drainage Strategy as well as the Battery Safety Management Plan under requirements 7 and 10 of Schedule 2 to the DCO, this had resolved this issue (Part 3 00:46:09:14-00:46:34:23). It appears then the EA are now content to rely on the issues and concerns which they have outlined in RR-130, REP-085 and REP1-086 about the amount of storage required for the firewater, the means of containing the firewater and the means of testing and disposal of the firewater being dealt with at the detailed plan stage.

Whilst paragraph 1.1.4 of the oBSMP (REP1-048) reflects the requirement for the Applicant to prepare the Battery Safety Management Plan (which includes details of the design of the BESS including measures to manage the firewater) which then must be submitted to the relevant planning authority (LCC) for approval, paragraph 1.1.5 of the oBSMP gives the Applicant power to unilaterally amend the plan prior to construction without the need to consult or obtain the approval of any of the consultees, including the EA, or LCC. Any comfort that the EA may take from the requirement to consult them on the Drainage Plan or the Battery Safety Management plan is obviated by the ability of the Applicant to make whatever changes they see fit to the Battery Safety Management Plan prior to construction. I suggest therefore that this paragraph be deleted from the oBSMP.

Temple Bruer - Heritage Impact Review

In response to the proposed Springwell Solar Farm (EN010149)

On behalf of Anne Heard

www.guytaylorassociates.co.uk

Contents

1. Introduction
2. Methodology
3. Review of Assessment and Stakeholder Engagement
4. Further Assessment of Significance & Contribution of Setting
5. Assessment of Magnitude of Change and Impact
6. Conclusion

1. Introduction

1.1 Introduction

Guy Taylor Associates have been appointed by Anne Heard, to undertake a review of the potential impact on the heritage significance of Temple Bruer, in relation to the proposed Springwell Energy Farm.

The development is currently at the examination stage of the DCO (Development Consent Order) process (application ref. EN010149).

The proposed development area extends across 1,280ha of land and features solar arrays and associated infrastructure extending from the south of the village of Metherringham, south westwards towards and beyond the line of the A15.

1.2 Purpose of review

This report has been commissioned due to concerns that the significance of the Temple Bruer site and the potential impact of the proposed development has not been adequately assessed in the examination process.

These concerns have been raised by Anne Heard (our Client), during the application process, however it is felt that these have not been sufficiently acknowledged.

The Temple Bruer site is highly valued by many, including Anne Heard. Her interest in the site is demonstrated by the thesis 'The Knights Templar in Lincolnshire', compiled for a PhD degree submission at York University, Department of Archaeology, in July 2008 (unpublished).

The purpose of this report is to provide an objective review of the submitted documents and supporting information, as well as provide any additional information, in order to assist the Examining Authority in their decision making. Much of this additional information has been taken from Anne Heard's Thesis and knowledge of the site.

The location of the Temple Bruer Preceptory in relation to the application site is shown on Figure 1.

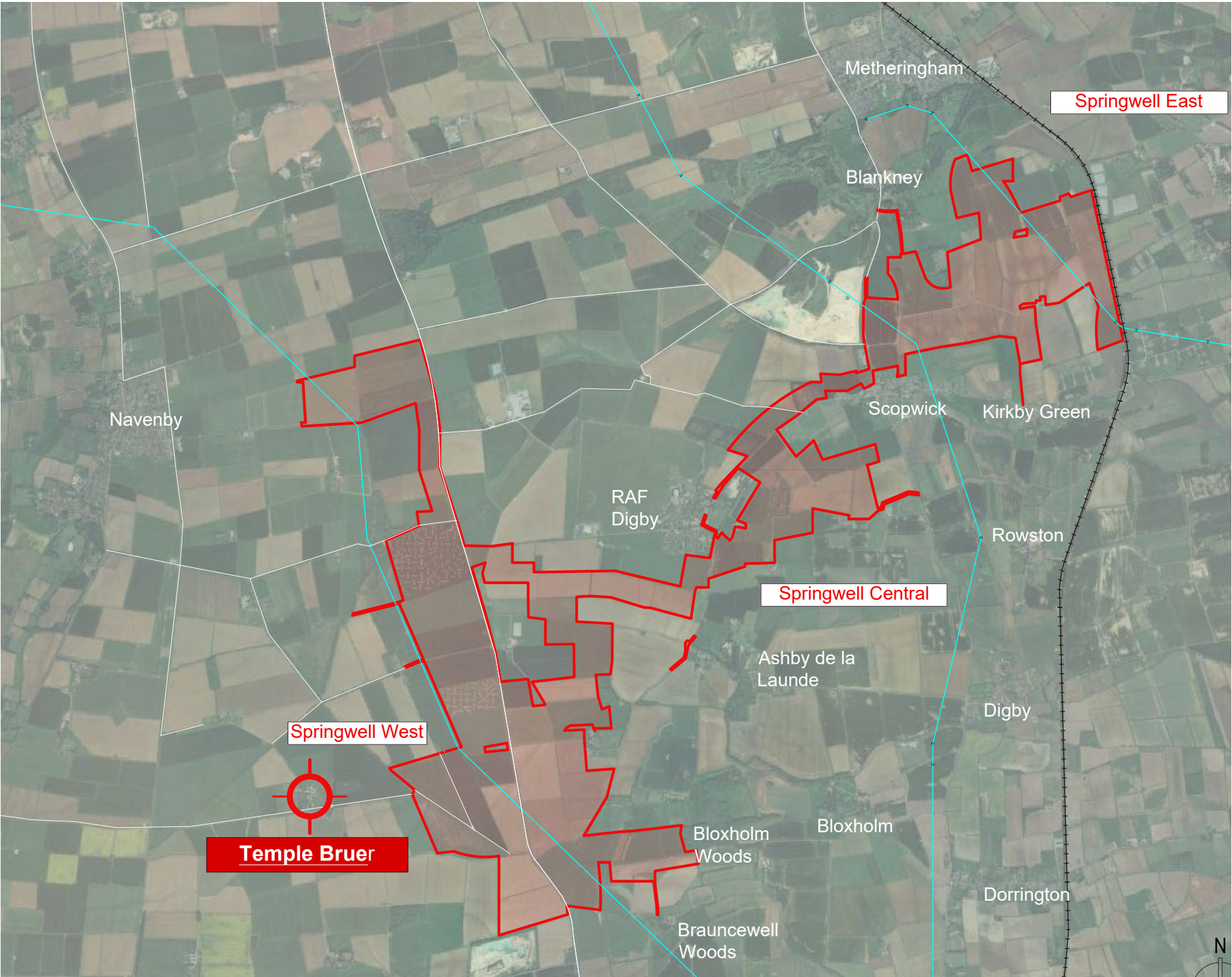


Fig.1 - Diagram showing the extent of the proposed development and proximity to Temple Bruer Preceptory (Source: GTA overlay on Google Map)

2. Methodology

2.1 Introduction

In order to undertake this exercise, information submitted as part of the application has been reviewed, desktop research undertaken and site visits made. Assessment of significance and impact follows a staged approach, guided by methodologies as set out in recognised best practice guidance (ref. Bibliography and Sources).

The focus of this report is Temple Bruer. The extent of the site to be considered is addressed as part of the heritage significance assessment. The primary designated heritage assets are as follows:

- Remains of preceptory church, Temple Bruer
 - Scheduled Monument
 - List entry: 1007686
- Church tower to the north of temple farmhouse
 - Grade 1 listed
 - List entry 1254328

2.2 Assessment Process

- STEP 1: Review of the assessment and stakeholder engagement in the DCO process to date. This to include:
 - Significance
 - Contribution of the site to significance
 - Relevant viewpoints
 - Assessment of impact
- STEP 2: Identify and undertake any further research / assessment required
- STEP 3: Conclusion

2.3 Assessment Limitations

■ Assessment Approach

This assessment adopts a relatively simple approach to analysis and does not involve detailed assessment techniques and complex forms of analysis such as viewshed analyses, sensitivity matrices and scoring systems. Instead, the purpose of this assessment is to provide a non-technical narrative argument that sets out ‘what matters and why’ in terms of the heritage significance and setting of the assets affected, together with the effects of the development on them.

Photos were taken in July 2025. It should therefore be acknowledged that prominence of some heritage assets and the proposed development may be more screened from views by mature trees and vegetation, compared with other times of the year.

■ Continual Change

The process of research and understanding of the value of any heritage asset and its setting is an ongoing and changing one, and there rarely comes a point when an assessment can be considered complete or final.

There is always the possibility that new information might be discovered which might change perceptions and understanding. The investigation of any individual building has not been exhaustive and further information could in future be derived.

2.4 Bibliography & Sources

The following documents have been consulted during the compilation of this report:

- Department for Communities and Local Government, Guidance - Historic Environment, 2019
- Department for Communities and Local Government, National Planning Policy Framework (NPPF), 2024
- English Heritage, 2008 Conservation Principles for the Sustainable Management of the Historic Environment. London: English Heritage
- English Heritage, 2011 Seeing the History in the View: A Method for Assessing Heritage Significance Within Views. London. English Heritage
- Historic England, 2015 Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2. London: Historic England
- Historic England, 2015 The Historic Environment in Local Plans: Historic Environment Good Practice Advice in Planning 1. London: Historic England
- Historic England, 2017 The setting of heritage assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). London: Historic England
- Mills, Dr. D, 1990 The Knights Templar in Kesteven. North Kesteven District Council

Further sources are identified within the text, as required.

3. Review of Assessment & Stakeholder Engagement

3.1 Significance & Contribution of the Site to Significance

3.1.1 The *Environmental Statement - Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment* aims to identify all known heritage assets potentially affected by the Proposed Development and assess their heritage significance.

The Study Area for this assessment comprises a 2km buffer for nondesignated assets surrounding the Site and a 5km buffer for designated assets, within which the archaeological and historical development of the site and surrounding area has been considered.

The following assessment of significance for the preceptory is provided:

The remains of the church of the Knights Templars' preceptory founded at Temple Bruer in the mid-12th century fell into disrepair in the 16th century following the Dissolution of the monasteries. The church tower survives as standing building which is also Grade I listed, the remainder of the preceptory survives as below ground remains. The monument has archaeological interest for the information the below ground and upstanding remains will contain regarding the construction, use and abandonment of the monument. It also has historical interest for its connection with the Knights Templar. The surviving tower stands in an area of domestic garden behind the Grade II Listed Temple Farmhouse. the site of the nave, chancel and north tower of the preceptory church, The remains of the church lie beneath gardens and car parks to the north and west of the tower. The tower is experienced surrounded by the later farm buildings and is visible at distances of up to 500m. It is not visible from the non-designated church of St John the Baptist, Temple Bruer located 1km to the north-northeast which now forms the parish church. The historic association with other medieval sites in the area – including the former villages noted above which also have connections to the Knights – contributes to the significance of this asset, although these connections are not apparent from the assets. At over 900m from the Proposed Development the contribution of setting to the significance of this asset will not be materially altered and it will not be included in the ES. (Page 44)

The medieval settlements of Dunsby and Brauncewell, historically associated with Temple Bruer, are also recognised in the DBA. The assessment acknowledges that these sites contribute to the significance of each other, although reiterates that these connections are not apparent from the assets themselves.

Both of these settlements are however included in the ES due to close proximity and overlaps with areas which were historically part of the

agricultural hinterland around the settlements.

3.1.2 *Annex 12 - The Gazetteer of Designated Heritage Assets with Potential for Effects* (ADBA) provides the following additional detail regarding significance:

-Remains of preceptory church, Temple Bruer

Scheduled Monument

List entry: 1007686

Brief description: Standing and buried remains of a monastery of the Knights Templars. Also functioned as an agricultural estate centre managing several other Templar properties in Lincolnshire. Precinct continues to be a working farm.

High importance

Significance: Archaeological interest; historic interest (association with Knight's Templar)

Contribution of setting: Rural surroundings contribute to understanding of the asset as an agricultural estate centre; visibility of the church tower contributes to its significance as the focus of the estate; association with other Templar and Hospitaller sites in the area also contributes though intervisibility limited

Approximate distance to site: 0.9km

In ZTV - no

Included for physical effects: no

Included for setting effects - no

3.1.3 It is noted that the church tower (Grade 1 listed, entry number 1254328) is not separately identified in the gazetteer.

3.2 Assessment of Impact

3.2.1 The *Environmental Statement - Volume 1, Chapter 9: Cultural Heritage*, provides an assessment of likely impact of the Proposed Development on the significance of heritage assets and the contribution made by their setting.

There is no mention of the Temple Bruer site in this document, due to it being scoped out of the assessment, as previously stated: *'At over 900m from the Proposed Development the contribution of setting to the significance of this asset will not be materially altered and it will not be included in the ES.* (Environmental Statement - Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment page 44).

3.3 Stakeholder Engagement

3.3.1 Consultation Report: Appendices A-1 to A-4

Summary of comment:

Comments highlighting the heritage value of Temple Bruer and the Knights Preceptory Tower and the need to ensure that this is not impacted by the Proposed Development. Pg. 181

Applicant’s response:

The Archaeological Desk-Based Assessment (ES Volume 3, Appendix 9.1 [EN010149/APP/6.3]) has considered the heritage significance of the remains of the Templar Preceptory and related heritage assets and how they draw significance from their setting. The Order Limits and the closest areas proposed for Solar PV development are proposed over 900m from the Preceptory Tower at Temple Bruer. Therefore, no visibility of the Proposed Development is predicted and there would be no impact on this asset.

3.3.2 Consultation Report: Appendices J-1 to J-2

Summary of comment:

Comment that the setting assessment does not sufficiently consider the impact on heritage features, and further engagement is requested with particular reference to..... Temple Bruer Knights Templar Preceptory Scheduled Monument ref 1007686 and Grade I Church Tower, north of Grade II Temple Farmhouse (1254328, 1261359). Pg. 181

Applicant’s response:

All designated heritage assets within 5km have been included individually in the gazetteer to ES Volume 3, Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3] along with the rationale for including or excluding them from the assessment. This includes the mills, the assets associated with Ashby Hall, the farmhouses, churches and scheduled monuments

3.3.3 Consultation Report: AppendicesK-1 to K-3

Summary of comment:

Comment that the area’s history and links to the Knights Templars is being ignored. . Pg. 62

Applicant’s response:

All designated heritage assets within 5km have been included individually in the gazetteer of the Archaeological Desk Based Assessment (ES Volume 3, Appendix 9.1 [EN010149/APP/6.3]) along with the rationale for including or excluding them from the assessment. This includes the remains of the Templar Preceptory at Temple Bruer (NHLE references: 1007686 and 1254328) and related heritage assets including Temple Farmhouse (NHLE reference: 1261359) and how they draw significance from their setting. The design of the Proposed Development has taken account of this to reduce visibility of the Proposed Development from the scheduled monument and listed building. No significant effects are predicted on these assets.

3.3.4 Environmental Statement Appendix 5.3: Scoping Opinion Response Matrix

Ashby de la Launde, Bloxholm with Temple Bruer and Temple High Grange Parish Council

Summary of comment:

The solid structures of the proposed solar arrays would form a strong physical presence of industrial appearance which would change the character of the rural fields in which they are located and be significantly out of proportion.

The proposed development would be an incongruous industrial and alien intrusion that would be harmful to the landscape character of the area, and a discordant feature within the pastoral setting. It would clearly cause harm to the visual enjoyment of those that live in, or visit the area.

The proposed development is out of keeping with rural character of the area. The solid structures of the arrays would form a strong physical presence of industrial appearance which would change the character of the rural fields in which they are located. The development would be visible in wider views and would form an incongruous expanse of metal structures out of keeping with the intimate and rural character of the area, and would be disproportionate to the scale of other landscape features. The solar farm would significantly adversely impact the character and appearance of the landscape. The expansive tranquil landscape of open green fields with far reaching views would turn into a semi-industrial, utility-grade power complex, with fields of 3m high dark solar panels, shipping containers containing electrical equipment and security fencing. As such, we consider the proposed development contravenes Local Planning Policy,

which requires that development proposals protect, enhance or restore the landscape character for its own intrinsic beauty, for future generations.

Currently there are extensive open views of green fields and agricultural farmland. The development would create significant adverse visual impact along any footpath or bridleway within the area, with arrays of 3 m high dark coloured solar panels which would tower above walkers blocking those views. Any footpath or bridleway would be separated from the site by a high security fence. The solar panels and fencing would destroy the wide, open views and create an unpleasant tunnel along the footpath and bridleway, degrading the amenity value.

The solar farm development would turn a pleasant and rural area into an industrialised area, protected by CCTV cameras, lighting, high fencing and warning signs – a far cry from the current beauty of the area. Detailed analysis of how the proposal meets current planning policy relating to the protection of rights of way, is required.

Applicant’s response

The Applicant acknowledges that the rural nature of the Site and the type of development proposed means that some of these effects cannot be mitigated.

3.4 Conclusion of Assessment & Concerns to be Addressed

Following a review of the submitted information and stakeholder engagement, the following concerns are raised:

- The assessment of significance is very limited and does not adequately reflect their classification as assets of High Importance.
- The assessment of significance is limited to the physical boundary of the scheduled monument and physical presence of the tower, with the assets scoped out of the Impact Assessment solely due to the lack of inter-visibility between the standing remains and the application site. It should however be recognised that the remaining structures (both above and below ground) were part of a much wider estate. Identification of this area should be acknowledged and its contribution to significance assessed.
- The Applicant's Archaeological Desk Based Assessment recognises that the rural surroundings contribute to understanding the history of the asset, however no assessment of impact on this setting is undertaken.
- Without this further assessment, it is not possible to confidently state that the contribution of setting to the significance of the assets will not be materially altered by the proposed development and the rationale for excluding them the assessment is undermined.
- Without this further assessment, submitted consultation concerns are not adequately addressed.

This report will therefore seek to provide additional assessment of significance, which will then further inform the potential impact from the proposed development.

4. Further Assessment of Significance & Contribution of Setting

4.1 International context

Myths and legends surrounding the enigmatic Knights Templar have given rise to a number of theories about the Order over the years, for example that the Templars are the guardians of the Holy Grail, a theme that was central to Dan Brown's novel, *The Da Vinci Code*, and the subsequent film of the same name starring Tom Hanks.

The reality is no less fascinating. The Order began in the early 1100s with two knights who were the founding members of a community that followed the Rule of a religious house, but devoted themselves to the protection of pilgrims on their route to Jerusalem. The Order quickly spread through Europe to England.

4.2 National context

A hierarchical network of administrative centres was set up to manage vast estates and to ensure that resources were sent east in support of the military operations of the Order. The majority of Templar land and estates in England were situated in Yorkshire and Lincolnshire. Figure 2 illustrates the distribution, numbers and types (i.e. either with or without a Preceptory), of these estates, across Lincolnshire (Heard, 2008).

Figure 3, taken from the North Kesteven District Council publication 'The Knights Templar in Kesteven', focuses in on the Kesteven district and provides further detail regarding the number and extent of the areas of jurisdiction (Baillia/Bailiwick).

By 1185 the Order held 4628 ha and 188 tofts in 182 separate villis in Lincolnshire, administered by six estate centres (Preceptories) at Willoughton, Aslackby, Eagle, South Witham, Mere and Temple Bruer (Heard, 2008). By 1190, it is understood that property had been given to the Order in almost one in every two Kesteven parishes, and that this was a record for England (Mills, 1990).

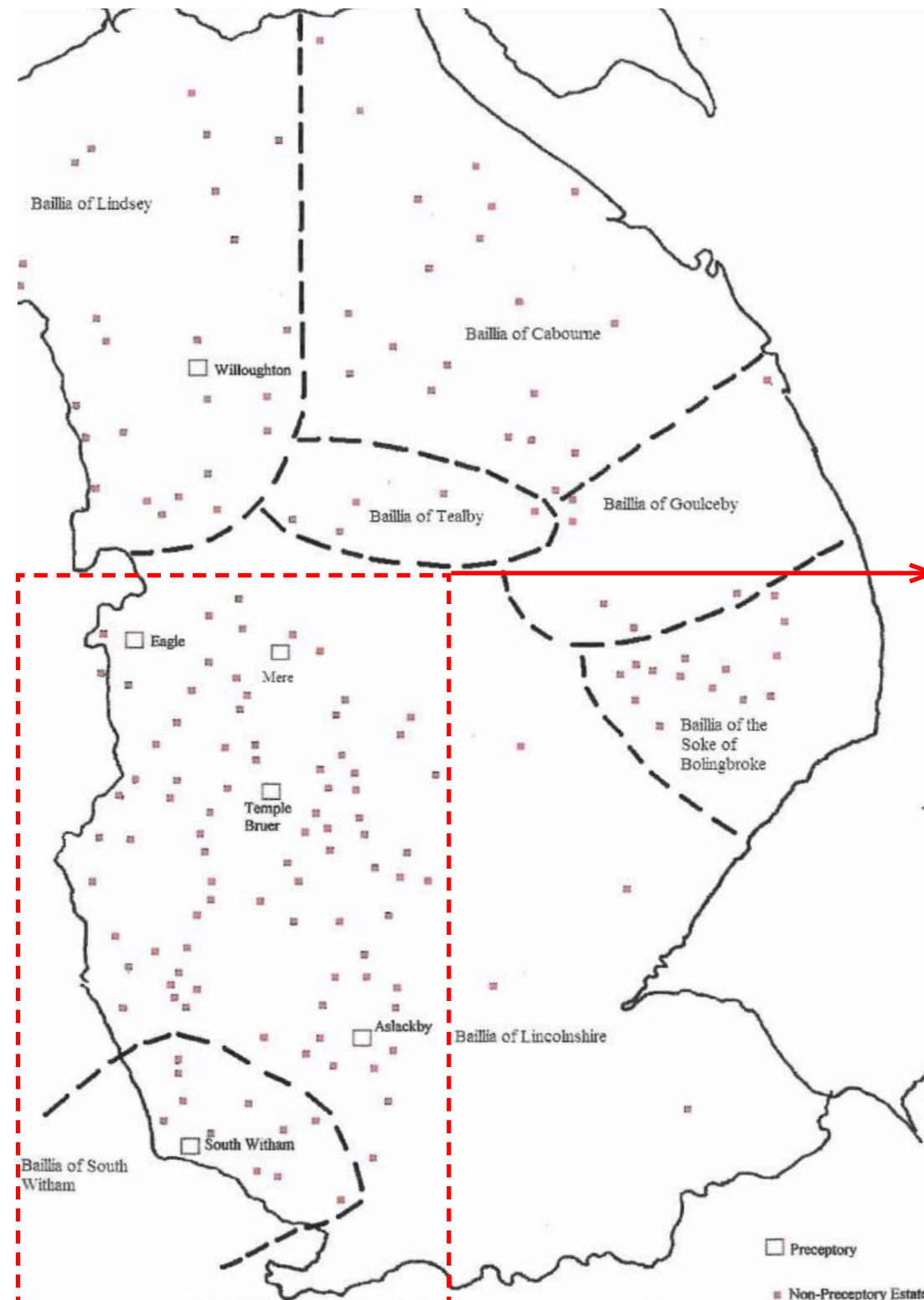


Fig.2 - Map showing the Templar Estates and Baillia in Lincolnshire. (Source: After Lees 1925)

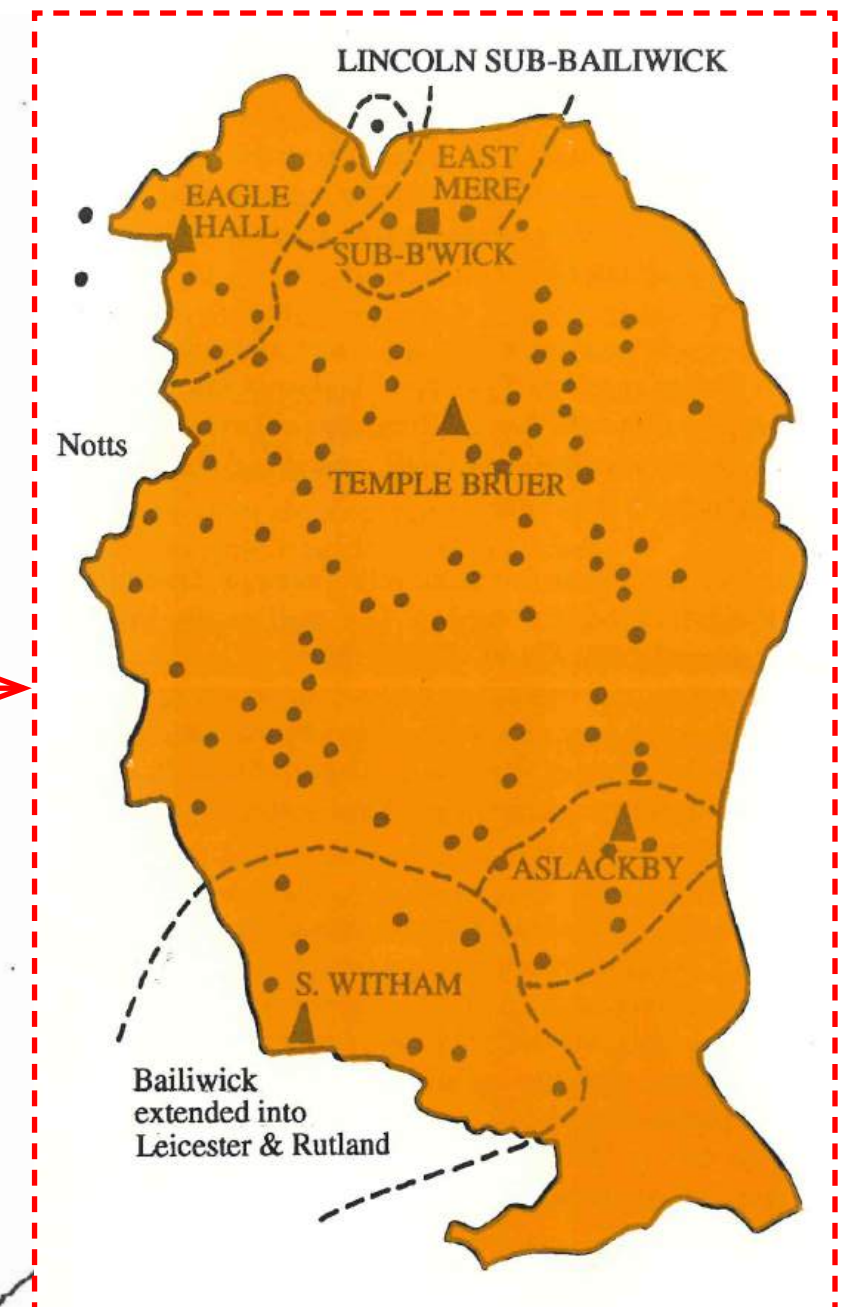


Fig.3 - Map showing the Templar Estates and Bailiwicks in the Kesteven district. (Source: Mills, 1990)

- ▲ Full preceptory
- Large manorial farm
- All other properties

4.3 Local context

The many donations of land to the Templars allowed them to buy, sell and exchange land to form large consolidated estates that acted as collecting centres for the surrounding scattered granges (outlying farms). They also reclaimed tracts of land to form the Preceptories, such as at Temple Bruer where the foundation charter c.1150 delineated a large area of desolate heath.

Within the estate were also areas of woodland and a rabbit warren, a symbol of high status and an important element of the designed landscape around the Preceptory.

The extent of the Temple Bruer Estate is illustrated in the NKDC publication (ref. Fig. 4).

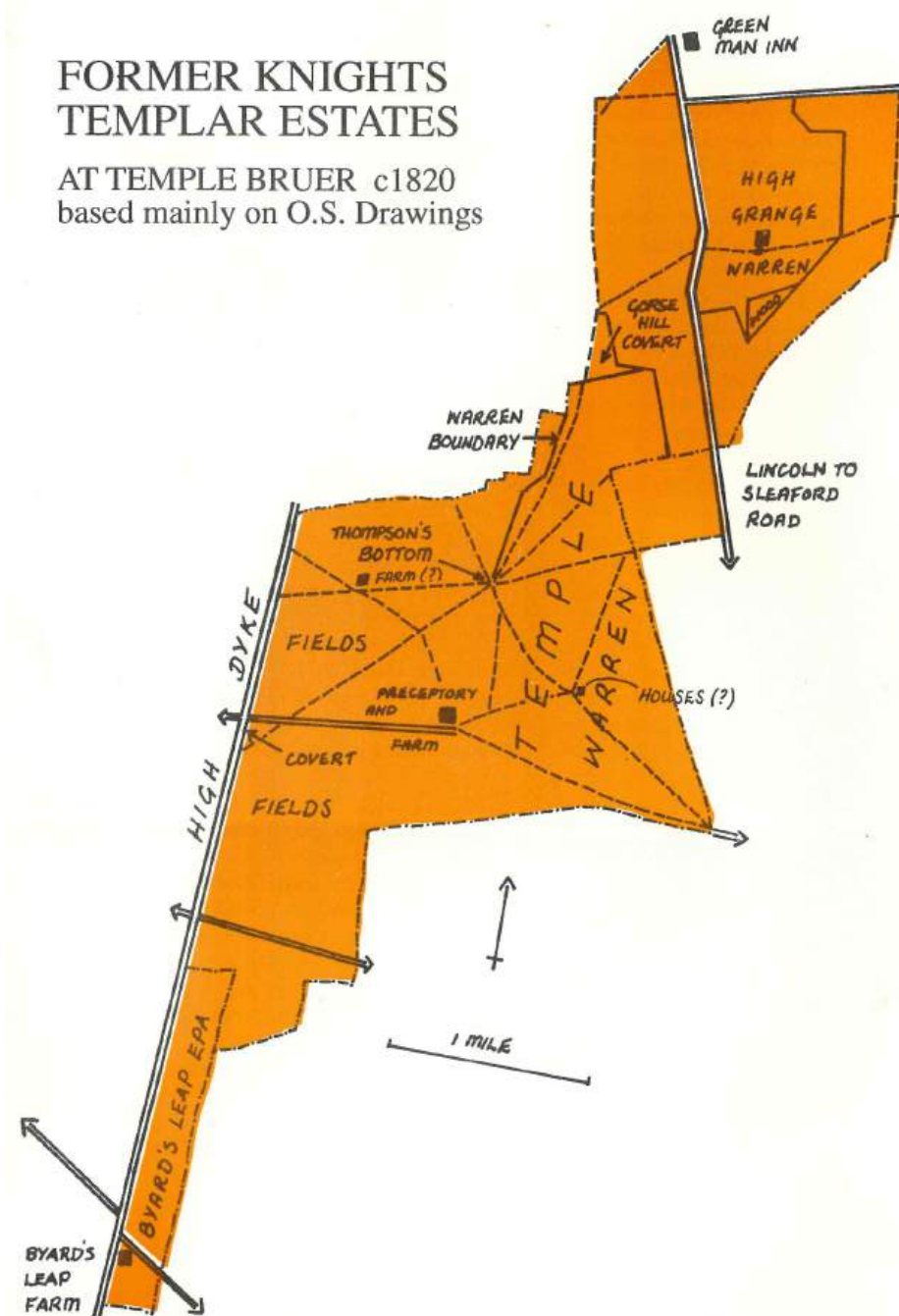


Fig. 4 - Illustration of the Temple Bruer Estate. (Source: Mills, 1990)

4.4 Reasons For Designation

The remains of Temple Bruer Preceptory church is a Scheduled Monument (list entry number 1007686), with the church tower itself a Grade 1 listed building (list entry number 1254328). The reasons for designation are set out on the Historic England, and can be listed as follows:

- *A preceptory is a monastery of the military orders of Knights Templars and Knights Hospitallers (also known as the Knights of St John of Jerusalem).*
- *Preceptories were founded to raise revenues to fund the 12th and 13th century crusades to Jerusalem.*
- *In addition, the preceptories of the Templars functioned as recruiting and training barracks for the knights whilst those of the Hospitallers provided hospices which offered hospitality to pilgrims and travellers and distributed alms to the poor.*
- *Like other monastic sites, the buildings of preceptories included provision for worship and communal living. Their most unusual feature was the round nave of their major churches which was copied from that of the Holy Sepulchre in Jerusalem. Indeed their use of such circular churches was unique in medieval England.*
- *Other buildings might include hospital buildings, workshops or agricultural buildings. These were normally arranged around a central open space, and were often enclosed within a moat or bank and ditch.*
- *From available documentary sources it can be estimated that the Templars held 57 preceptories in England. At least 14 of these were later taken over by the Hospitallers, who held 76 sites. As a relatively rare monument class, all sites exhibiting good survival of archaeological remains will be identified as nationally important.*

The site of the Knights Templars preceptory at Temple Bruer is rare among examples of the monument class in including standing remains; the south tower of the preceptory church stands to a height of over 16m, most of which is original stonework. Archaeological excavation over a large area of the monument has both demonstrated the survival of below-ground remains of the church and provided an increased understanding of the site, while leaving intact buried architectural remains and valuable underlying deposits. A high level of archaeological, as well as historical, documentation is thus available for this monument. With the provision of public access the monument also serves as an important educational and recreational

resource.

The Knights Templars' preceptory at Temple Bruer was founded around 1150 with grants of land from William of Ashby, an adjacent parish out of which the estate was first established. The preceptory became the chief of five Templar houses in Lincolnshire, functioning as an agricultural estate centre from which a large number of Templar properties in the county were managed. In 1308 it was the second wealthiest preceptory in England, with a weekly market and a substantial secular settlement outside the precinct walls.



Fig. 5 - Photo looking towards the north elevation of the South Tower. (Source: GTA)

4.5 Contribution of the site to significance

The Temple Bruer site has greater value for being part of a larger entity. The significance of the site extends beyond the fabric of the tower and recognised boundary of the monument, and should be considered in the wider context of the former estate, as a minimum.

The character of the estate that surrounded the Preceptory was that of an open rural landscape, featuring scattered farmsteads, hedgerows, coverts (dense groups of bushes), distinct areas of woodland, grassland, pasture and stone walls. This character is depicted in visual reconstructions of the site, such as the drawing by David Vale and 3D rendered model produced by Heritage Lincolnshire (ref. Figs 6 and 7 respectively). These representations are often found in promotional material and are therefore widely circulated and recognised.

This rural landscape contributes to understanding the asset's historic association with the agricultural community and industry, and the integrity of this landscape has remained relatively intact (ref. Fig 8).

As can be seen in Figure 9, the application site overlaps a large area of the former Knights Templar Estate. The blue area denotes the former estate, with the red areas being the overlap with the application site (i.e. a total of nearly 270ha). Currently, these areas feature open farmland and are therefore representative of the historic rural character. The application site therefore currently contributes to understanding the historic relationship between the assets and the wider estate.

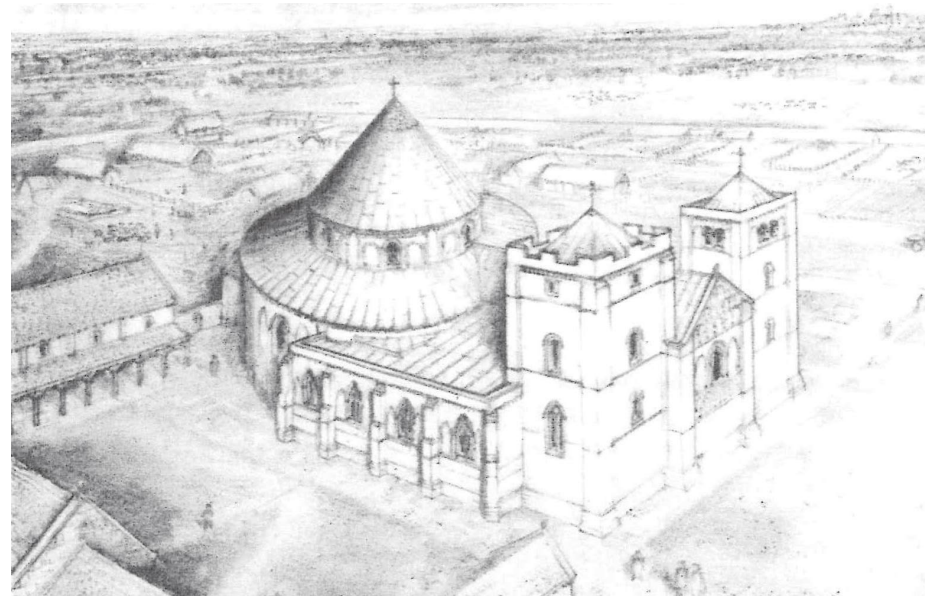


Fig. 6 - Reconstruction view c. 1400 (David Vale)



Fig. 7 - Reconstruction visual (Heritage Lincolnshire)



Fig. 8 - Present day photograph (Source: Heard, A)

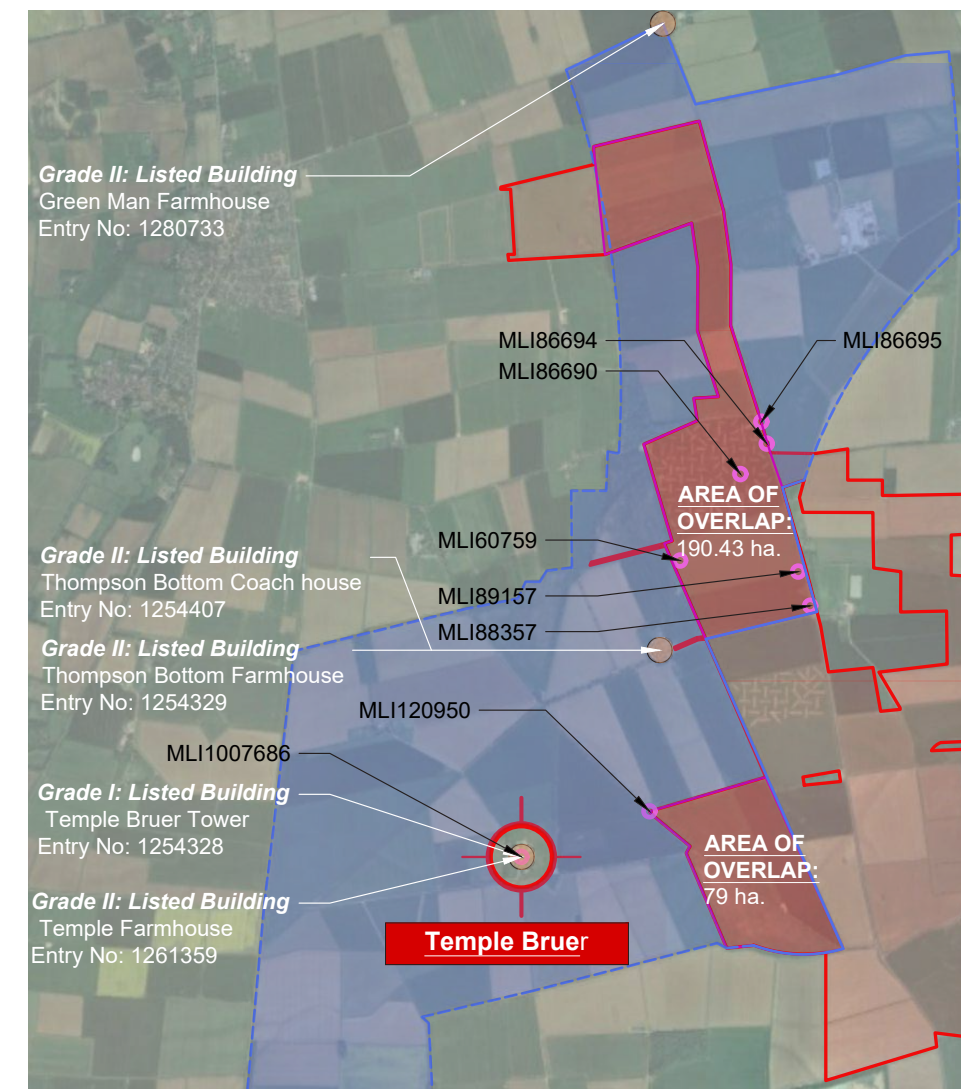


Fig. 9 - Diagram showing the overlapping areas (infilled red) of the application site (red line) and the former Temple Bruer Estate (blue). Also identified are the heritage assets within the former estate boundary.

4.6 The Designed Landscape

Another important feature of the landscape are the surrounding roads and pathways, providing kinetic views across the Estate and towards the Preceptory. As is stated in the NKDC publication:

'The Templars must have been great travellers, even more so than other religious orders, members of which went on pilgrimages and made journeys between houses for business and scholarly reasons. Templars would have gone on 'recruiting campaigns' and their banking activities demanded a certain amount of travel, including the movement of their own funds and those intended for use in the Holy Land' (Mills, 1990).

All Preceptories were therefore located close to a major road at the time, in order to provide the required connectivity with surrounding Templar estates and important cities. At Temple Bruer, Ermine Street provided the main routes to Lincoln, South Witham, Stamford and London, and it is likely that this was a key reason for choosing this location for the administrative centre.

Routes around the site have been extensively researched using historic maps, topographical evidence and archaeological excavations. Some of the findings are illustrated in the NKDC publication (ref. Fig 10).

The PhD Thesis By Anne Heard goes further, with the assistance of archaeological ground penetrating survey information (ref. Fig. 11). The Templars determined the route of the approach roads to the Preceptory, allowing glimpses of the its buildings at staged points during the journey. The roads from Ermine Street to the west and the road built by Bishop Alnwick (1436-49) (the modern A15) from the east joined to the south of the Preceptory and curved northwards past uniform rows of crofts, occupied by the Templar's tenants, on either side of the road. Beyond the crofts may have been a small chapel built by the Templars, possibly for the use of their tenants. Next to the chapel was the village green, where the weekly market was held. Approaching the two crenellated towers that formed the gatehouse of the Preceptory, the visitor would see the high walls around the precinct, with the twin towers of the church rising above them. These elements were consciously designed by the Templars to create a visual impression that demonstrated the power of the Templars and their dominance over the surrounding countryside. (Heard, A. 2008).

Many of these historic routes remain evident today, either as roads, footpaths or parish boundaries. Those which are located within the application site boundary and former Temple Bruer Estate are identified in Figure 12 (area shaded red).

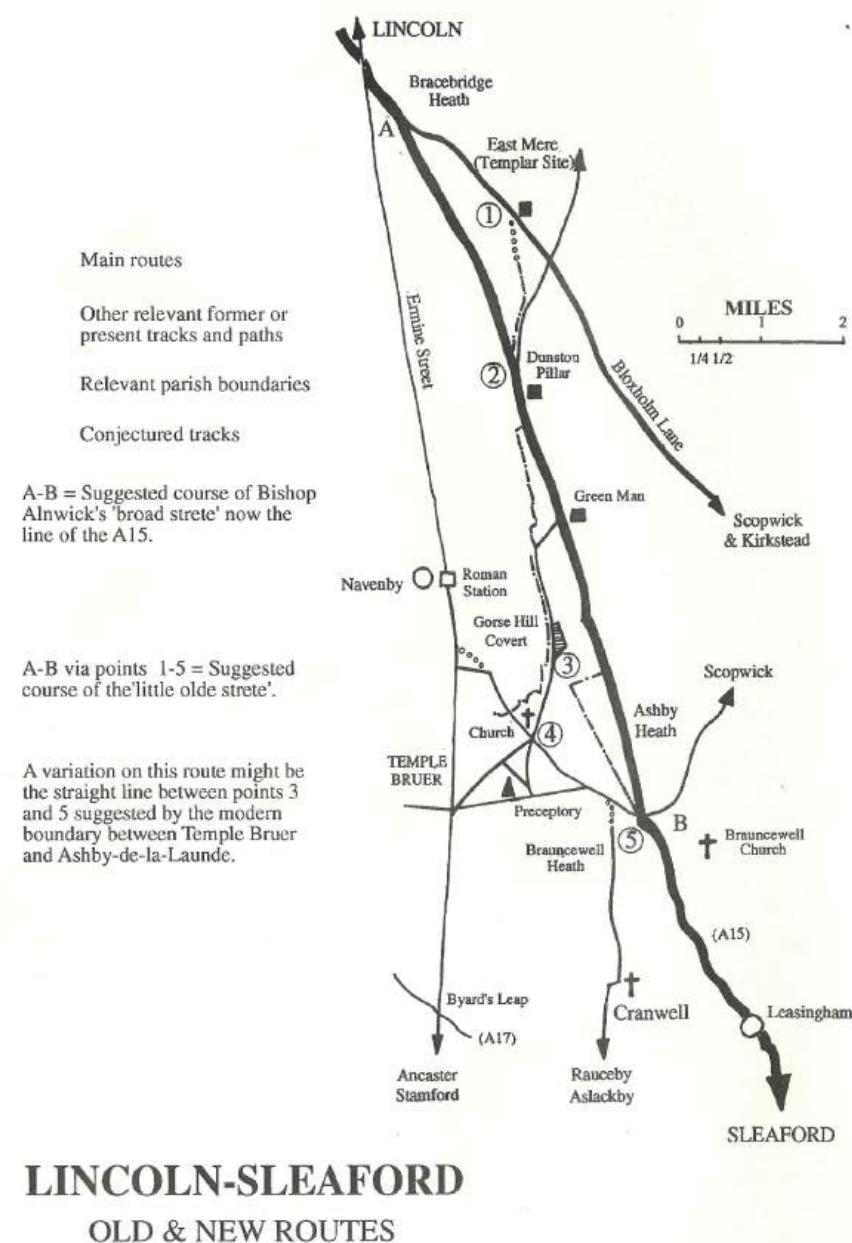


Fig. 10 - Diagram showing old and new routes around Temple Bruer (Source: Mills, 1990)

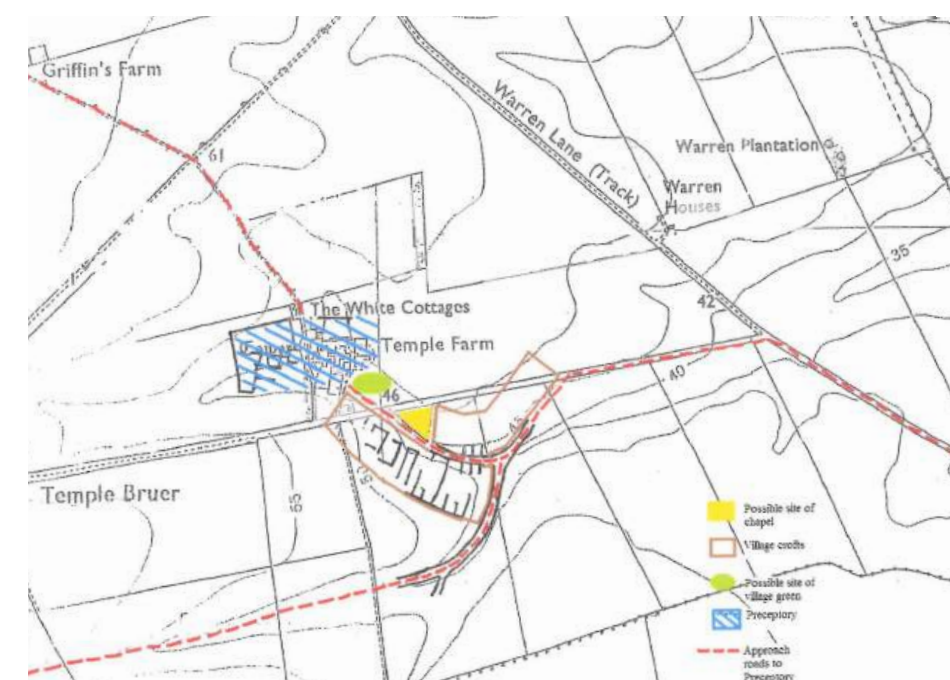


Fig. 11 - Diagram showing the designed landscape surrounding the Temple Bruer Preceptory (Source: Heard, A)

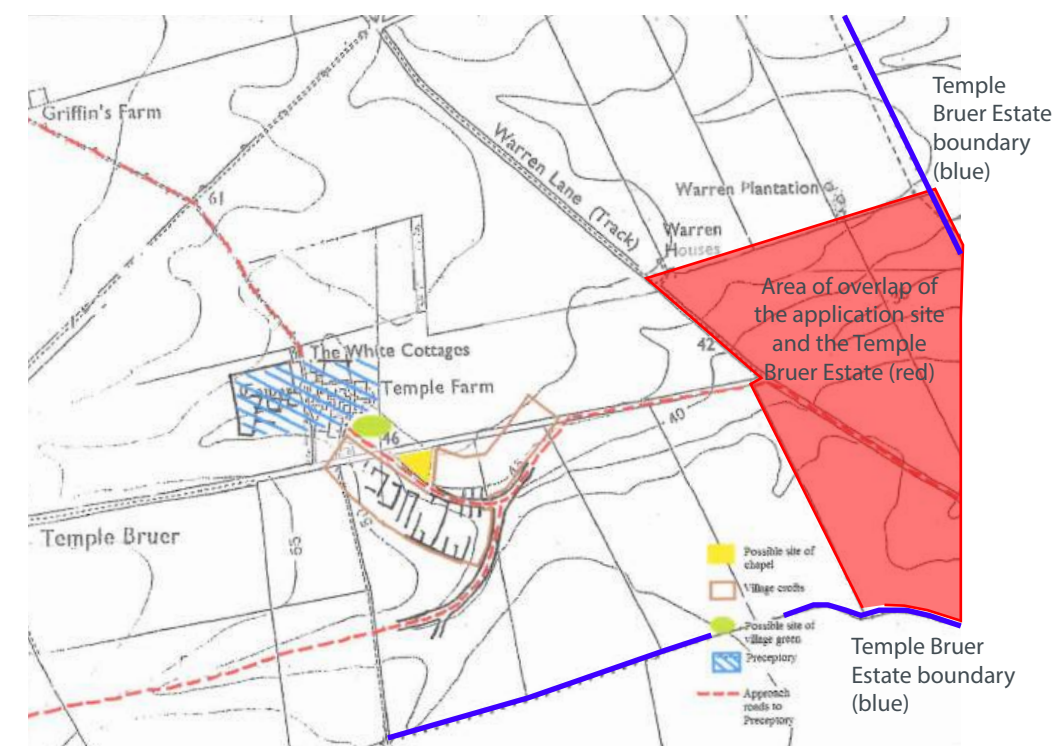


Fig. 12 - Diagram showing the application site overlaid on the designed landscape

5. Assessment of Magnitude of Change and Impact

5.1 Relevant Viewpoints

The application site overlaps a large portion of the former Knights Templar Estate, with the following key proposed works in these locations:

- 1 Springwell Substation and Main Collector Compound
- 2 Battery Energy Storage System (BESS)
- 3a 3b Solar PVs

These works are identified on Fig. 13.

Viewpoints have been considered where the proposed development impacts these overlapping areas of land. Not all viewpoints feature the Preceptory tower, however the views are still considered relevant due to the experiential aspect of the moving through the historic landscape that still forms an integral part of the Temple Bruer story and therefore understanding.

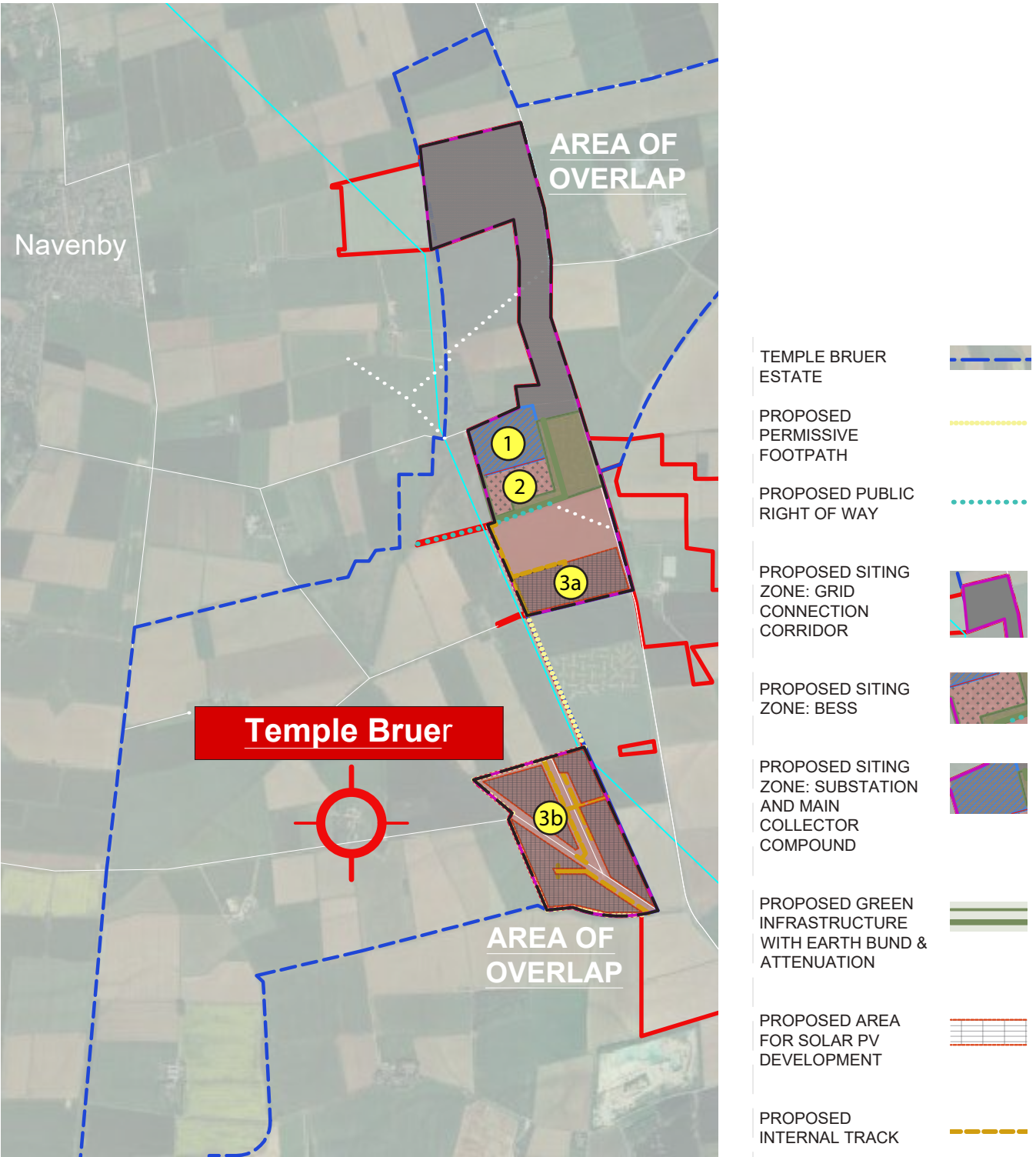
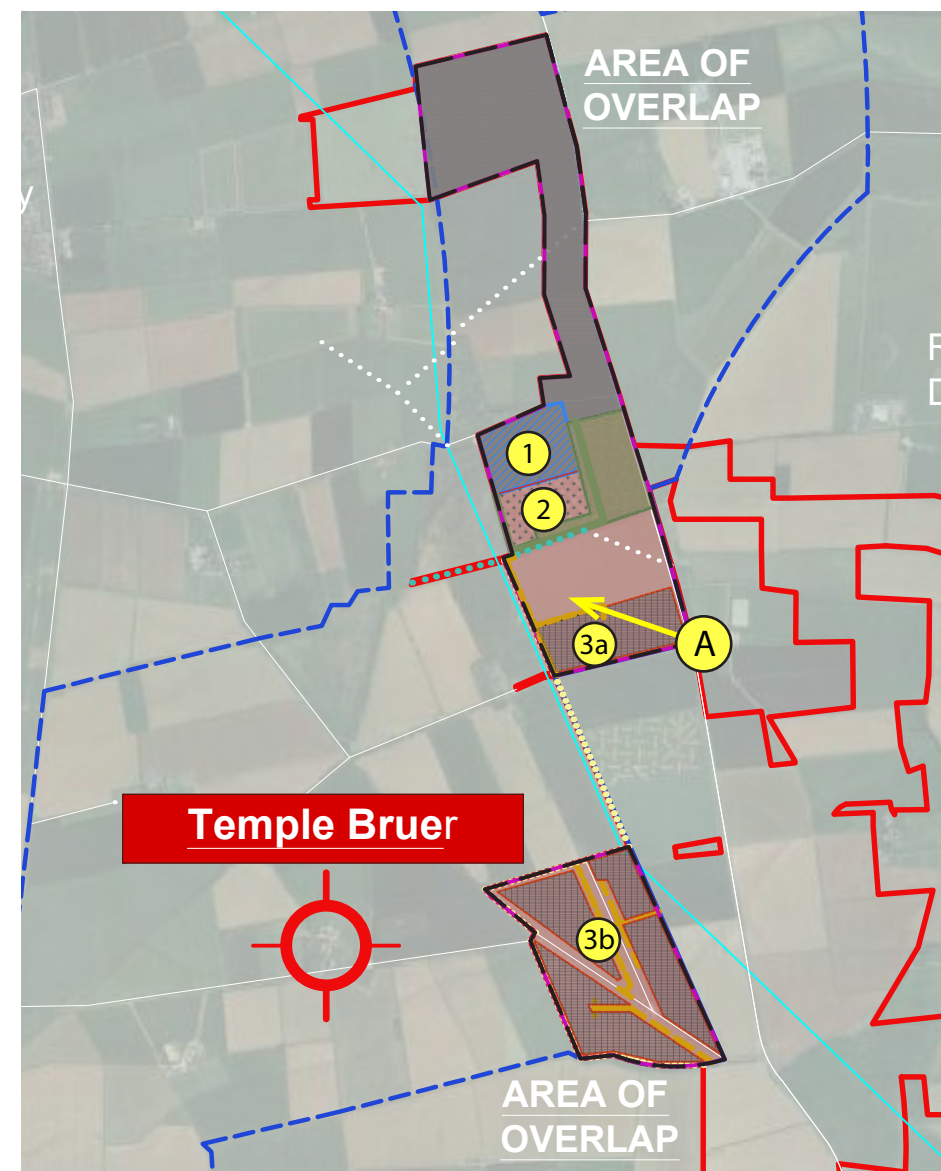


Fig. 13 - Diagram showing the proposed development to be sited within the 'overlap' area

5.2 Viewpoint A

- View name: View from the road junction A15 and Griffin's Farm Lane, looking northwest.
- Reason for selection:

This view has been selected because it looks across a central area of the former Temple Bruer Estate. This area is an integral part of the proposed development and its potential impact on the significance of the Temple Bruer site has not been sufficiently assessed in the submitted ES.



NOTES: The red shaded areas are indicative of the approximate development area and do not attempt to provide a visualisation of the proposal. The intention is to identify areas of impact which would require further assessment.



Fig. 14 - Viewpoint A indicating area to be affected by development

5.2 Viewpoint B & C

- View name: Views from along Temple Road on the approach to Temple Bruer, looking towards the Preceptory to the west.
- Reason for selection:

This view has been selected because it is located on a historic approach to the Preceptory, within the Templar Designed Landscape. Its potential impact on the significance of the Temple Bruer site has not been sufficiently assessed in the submitted ES.

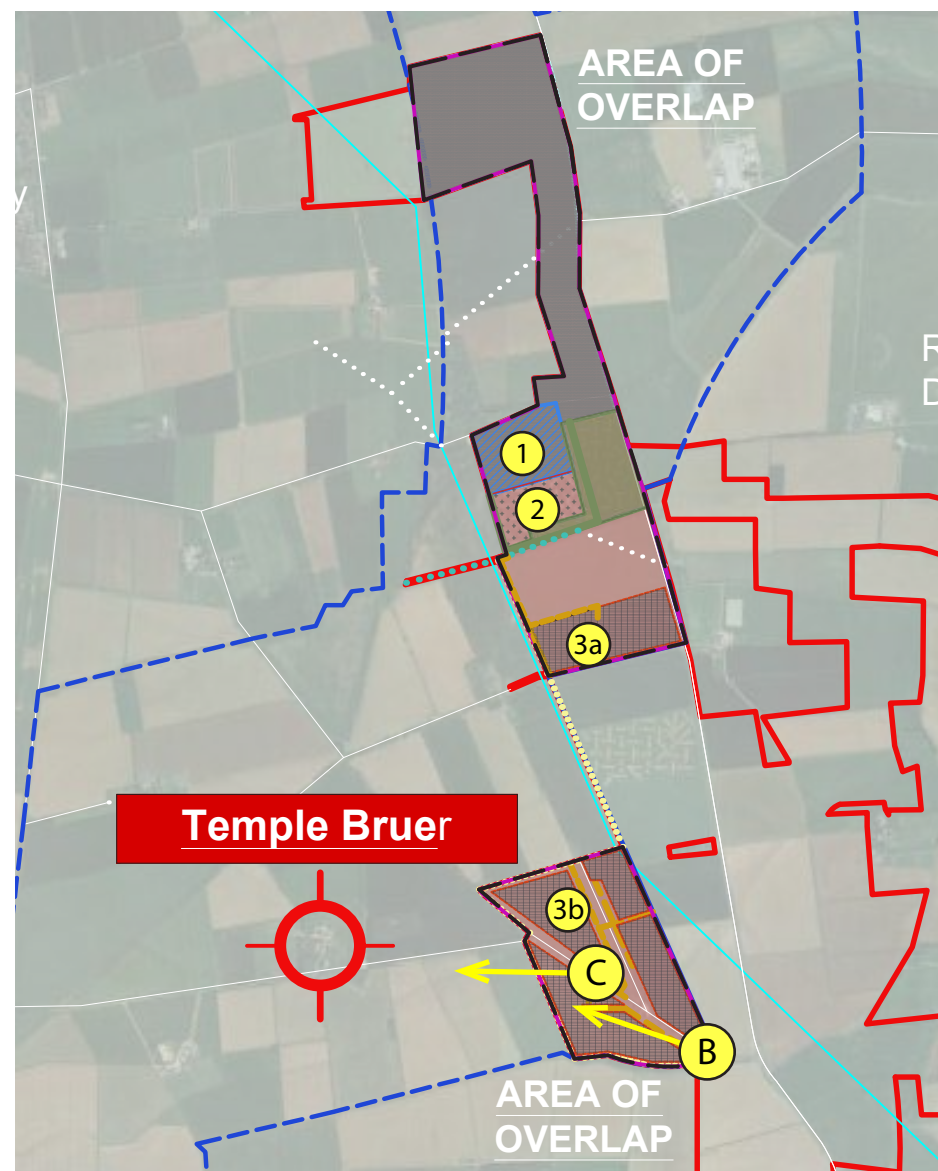


Fig. 15 - Viewpoint B indicating area to be affected by development

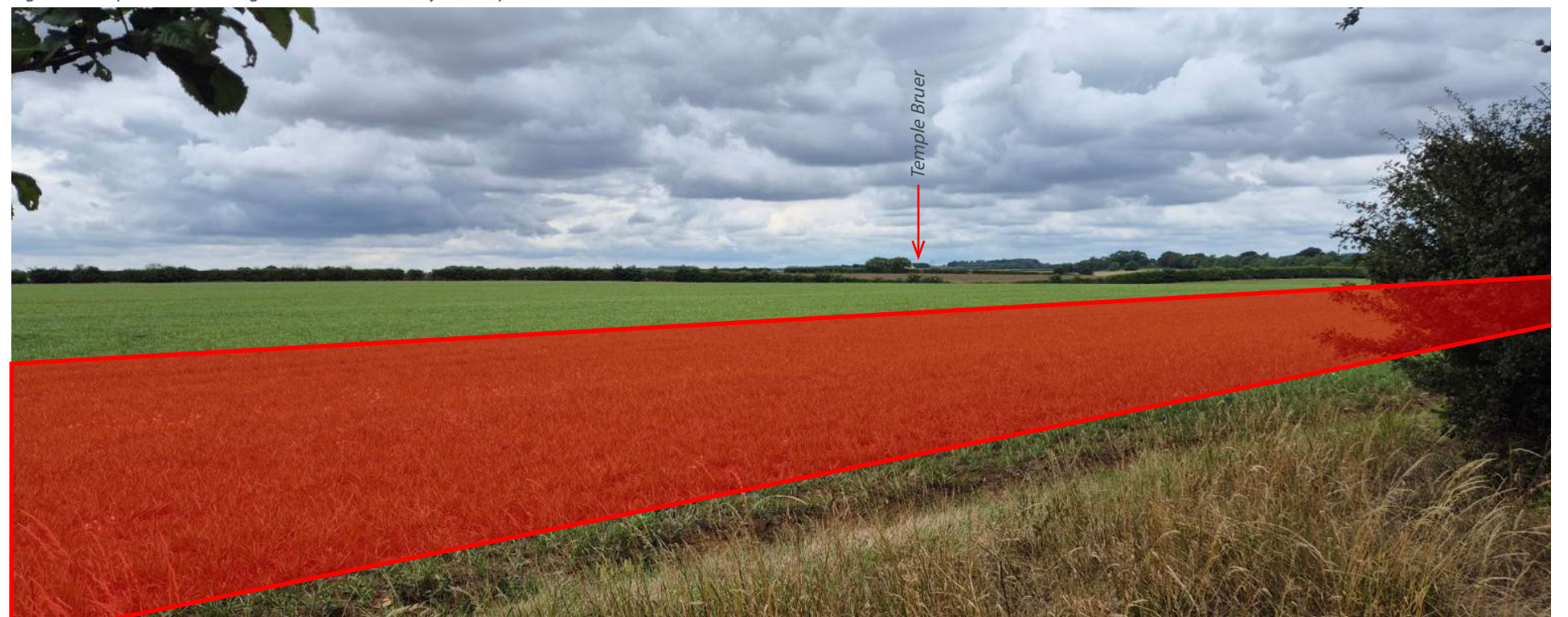
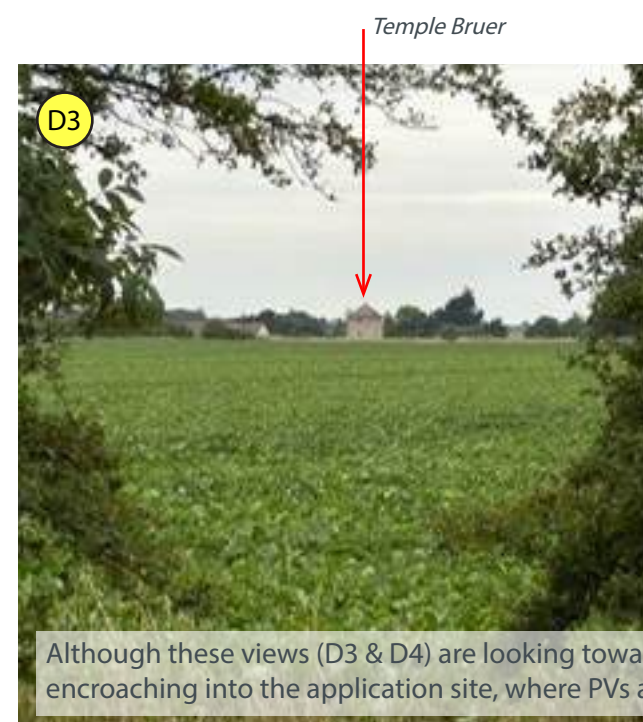
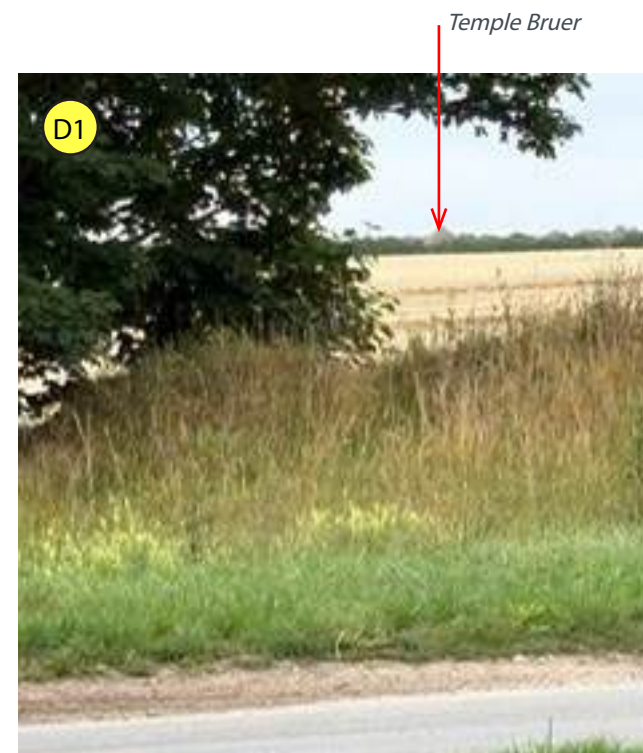
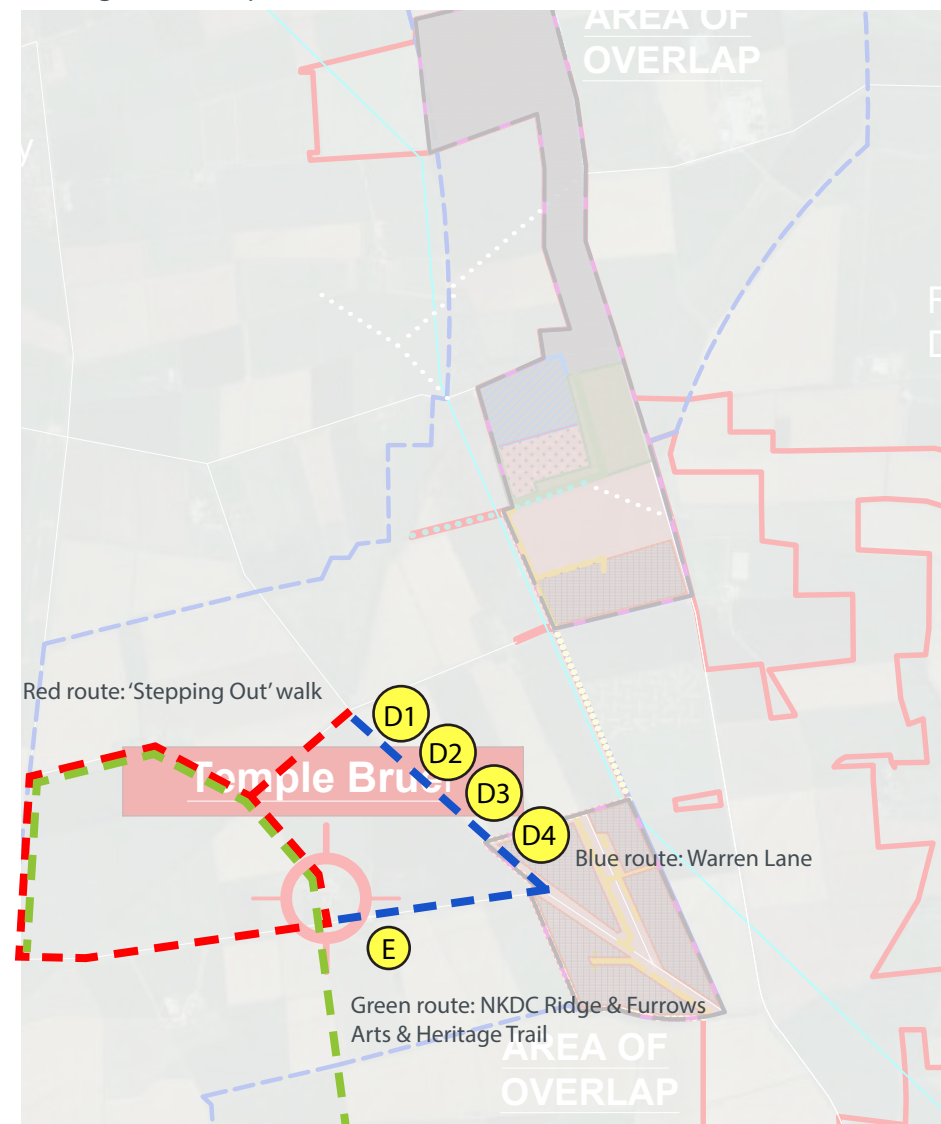


Fig. 16 - Viewpoint C indicating area to be affected by development

5.3 Kinetic Views Along D (Warren Lane)

- View name: Views from along Warren Lane, heading south east, on the approach to Temple Road, looking towards the Preceptory.
- Reason for selection:

This view has been selected because it is a well-used track, joining up with other recognised trails. These routes are designed to link heritage sites and enable visitors of the area to experience kinetic views of the Preceptory, within a rural setting that contributes to understanding of the asset as an agricultural estate centre. This track leads into the application site, before turning down Temple Road.



Although these views (D3 & D4) are looking towards the tower, the viewer will at this point be encroaching into the application site, where PVs are to be located.

6. Conclusion

6.1 Contextual Understanding

The heritage significance of this site is tied to the historical context and setting. Changes that disrupt this setting can diminish the asset’s cultural value and historical narrative.

6.2 Public Perception

The application site currently contributes to understanding the historic relationship between the assets and the wider estate, however this assessment demonstrates that this may be significantly undermined by the proposed development.

Alterations to the setting can influence public perception of the asset’s importance and the visitor’s ability to fully understand and appreciate its significance.

Visits to the Preceptory as well as walks that pass through the site are actively promoted, with many visitors experiencing the historic site within its rural setting.

6.3 Preceptory Visits

The site is under the custodianship of Lincolnshire County Council and is kept open to the public, attracting visitors from across the country due to the its national significance and tangible connection with the Knight’s Templar.

Exploration of the site is actively encouraged on the Lincolnshire County Council website, where it is stated, ‘...this remarkable heritage site offers visitors a unique opportunity to explore the fascinating history and architectural beauty of the Knights Templar. Steeped in legend and lore, Temple Bruer invites guests to step back in time and discover the secrets of its medieval past.’ (LCC website).

The wesite also states that, ‘Our aim is to preserve the integrity of Temple Bruer for future generations to enjoy.

6.4 Walks Through and Around the Preceptory Site

NKDC’s Ridge and Furrows Arts and Heritage Trail is a 30 mile trail extending from Sleaford to North Hykeham. The route picks up many heritage sites including the Preceptory. In addition, one of the ‘Stepping Out’ walks also passes directly through the site and is promoted by NKDC. These established walks actively encourage visitors to experience the historic site within this wider context.

As part of NKDC’s submissions to the Springwell application, it is stated that ‘walking is a key reason for visiting North Kesteven in the Council’s tourism strategy 2024-29. The promotion of walking routes is recognised as an ongoing action within the Tourism Action Plan. The Stepping Out walks network across NK covers over 200 miles of walking trails.’ (Page 16 of NKDCs Response to ExA Q1 REP1-103).

Based on quarterly footfall data provided by NKDC, across the whole Stepping Out network for 2024/5, 25,283 people used the walks on their own (as opposed to organised walks) with 6617 people using the Wellingore and Temple Bruer trail.

6.5 Conclusion

- The significance of the Temple Bruer site extends beyond the confines of the tower walls and monument boundary, and this has not been fully acknowledged in the submitted ES.
- The former Templar Estate area, along with the wider rural context all contribute to the significance of the site and how it is interpreted.
- The proposed development has a significant area of overlap with this historic estate boundary and the introduction of substantial structures (including the substation, main collector compound, BESS and solar PVs has the potential to significantly impact and undermine the historic significance. Proposed means of mitigation would also introduce incongruous features to the rural landscape.
- This further assessment of significance and impact indicates that the information submitted within the ES does not reflect the High Significance of Temple Bruer. It is recommended that further assessment by the applicant is therefore undertaken in order for the full impact to be understood.
- The Temple Bruer site is enjoyed and experienced by the local community and visitors from across the country. The potential of the development to undermine the perception and interpretation of this site requires further consideration.



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