

Rec'd 12/8/25



The Planning Inspectorate

Temple Quay House

Temple Quay

Bristol B51 6PN

Application No ENO 1019

Interested Party No 20054685.

10th August 2025

The Planning Inspector Springwell Solar Farm

The Planning process rationale: in the beginning (which sounds like a passage from the book of Genesis) in the autumn of 2019 a director of Blankney Estates Ltd said that Springwell had to be the size that it was planned to be to justify the funding of a substation. That was in reply to my statement that I thought it was far too big. I have no issues with solar farms constructed on indifferent land of say up to 40 ha.

It is patently obvious to me that once this net zero government initiative became apparent, opportunist city traders saw a way of making money out of it. When Fosse Green and the others were planned is when the Navenby substation was first muted. It is my opinion that the applications for Fosse Green, Springwell and even Leoda should have been put on hold until the substation was able to catch up in the application process.

This is a unique situation as far as I can tell the no other solar NSIP applications which have been granted permission without a connection to the grid, the ones north of Lincoln and in Suffolk all have a built substation facility to connect to.

The Navenby substation application has been delayed yet again, geographically it is quite close to Ermine Street the old Roman Road - to give an example the east Lincoln bypass was delayed for two years because of an archaeological dig. I know it is all conjecture but Lincolnshire is well known for containing Roman artefacts, the discovery of potential artefacts or human remains could either delay or re-site the Navenby substation. It is quite possible based on my [REDACTED] years of planning experience that this substation won't be built in my lifetime, circa 2035, we only have to look at HS2 as an example.

The other potential problem with the substation is political. Richard Tice MP has categorically stated that if Reform forms the next government (which is extremely likely even in coalition) they will veto every net zero initiative and that includes all planned substations. National Grid directors have been informed thus. We could say that this government has got four more years

in power and National Grid will be able to pursue the application to its completion. We all know what happened to the Cumbrian coal mine and the northern section of HS2, they were cancelled by the central government. With the potential political situation at the moment I don't see this government lasting its full term, we only have to look how long the Heath government of the 1970s lasted?

There surely must be some certainty when granting a planning application of this nature. And I am sure you will agree the potential of the Navenby substation has certain risks:

- discovery of archaeological artefacts;
- the LPA refusing consent;
- the planning inspectorate dismissing the appeal;
- the potential of a judicial review or other civil court proceedings.
- central government intervention.

As far as I am aware Springwell does not have a Plan B. They haven't brought forward a contingency submission such as going back to square one where they were going to provide their own substation.

Without all these issues resolved and the Navenby substation considerably constructed I cannot see how the planning inspector or subsequently the Secretary of State could give permission for a project where the end use to the consumer is not assured. It would be like granting permission for a six lane motorway to a river crossing where a bridge was not either planned or built.

I suppose the planning inspector or the Secretary of State could grant a permission with pre-commencement conditions, such as: once a substation is provided to accept the generated power. But that seems pointless.

The potential damage from percussion piling to the land drainage systems: I know the applicant/developer says they are going to mitigate any damage which they do to the land drainage systems. I take this to mean when they are not able to identify the pipes and go through any land drainage infrastructure when excavating trenches for cables etc they will replace it or repair it to its original state before backfilling this you would expect to happen in any engineering works. When we had gas and oil lines coming through this part of Lincolnshire there was a resident engineer on site all of the time to make sure that all reinstatement was done properly and logged. My question to the applicant/developer has been all along who is going to supervise these works or is it a poacher and gamekeeper scenario where there is no external supervision? I think we know the answer, or is Blankney Estates Ltd going to appoint a Clerk of the Works to supervise the whole project, again I think I know the answer. How can we the general public be sure that these works will be carried out as per the developer states in his responses. Over my career I have supervised and installed hundreds of miles of underground infrastructure and nobody knows more than I how important it is to return it all to its present state. The problem is once it's backfilled no one knows that it was done. Going back to the 1980s when John Laing installed a 36 inch gas line through this part of Lincolnshire every repair was photographed, logged and indicated on a plan. I find it difficult to know how the planning inspector can ensure that this type of remedial work is carried out.

At the public enquiry one of Springwell agents said they are going to get access to the land drainage plans in Blankney Estates offices and plot where the pipes actually are. These plans are hand drawn as an indication of where the systems are installed. Enclosed with this communication is a plan of part of the land drain system above Scopwick possibly drawn just before or after the second world war. The only way the applicant/developer can plot this infrastructure is to physically inspect it. My other argument is regarding drainage is that the vibration from the percussion piling will shatter these fragile clay pipes even though they may be some way from the actual pipe most of these pipe runs are approximately a chain apart (22 yards) and not all of them outfall into a ditch lots of the laterals as you will see from the plan outfall into a main drain which subsequently outfalls into a ditch. I know of no reliable detection equipment that will detect clay pipes below ground if there is all well and good but I believe that Springwell should submit a full proposed works method statement of how they are going to a) detect these locality of these pipes, b) test that they are now in working order and c) ensure that they are still in good working order once the development has been completed. Not only is there an issue with percussion piling fracturing the land drainage pipes, I also have concerns that these piles will go through the clay subsoil level situated approximately 1-1.5 m below ground level. As I've mentioned previously this land is subjected to artesian water effects and springs rise through this clay subsoil in many parts of this part of Lincolnshire puncturing this clay layer may have an effect of allowing spring water to come through the clay layer in places it wouldn't have done previously thus exacerbating the land drainage issue even more. I believe that a full geological survey of these subsoils to examine what effect this will have should be carried out by the applicant/developer and the findings deposited with the inspector prior to the application being decided.

I don't think Springwell had any idea that this land was under drained when they first submitted it for development and since they have discovered that it is through our efforts, they have been playing catch up and trying to address the situation.

The lack of supervision and reinstatement of infrastructure and ongoing maintenance, together with the disposal of all the installation when it's usable life comes to an end as suggested by the developer: a solar farm of this size has not yet been constructed in this country, so there is nothing to draw information from. As previously mentioned we as a community if this development gains consent want to know how it is going to be monitored and supervised all the way through its construction phase. It's fine for the applicant/developer to put solutions forward in their answers to questions but what are they basing that on is supposition because in my mind they cannot draw these conclusions from any previous installation of this size? As previously said I would like to see a full work method statement of how they are going to ensure that the land drainage infrastructure that is present at the moment is operating in exactly the same way as it is now on the completion of the construction phase. I fear that the first the villages of Scopwick will know about the inadequacies of the construction phase is when we experience floodwaters running towards the settlement and then of course once the panels have been constructed remediation is almost impossible unless the work is carried out by hand. It is just not the area north of the village of Scopwick that worries me but the whole development as far as supervision of the construction phase goes. As far as I'm aware there is no outside body that is going to supervise the development.

The national need for this project and the potential for the developers to export this power via the Viking link to Jutland: The power that these solar farms/factories will produce at the height of summer will be far in excess of the demand that the United Kingdom will have. We have been

made aware that one of the reasons for financiers getting involved in this net zero initiative is because profits will be made from exporting the surplus power via the Viking link to Europe where their industry is in demand. The National Grid officer has confirmed that the BESS installations that are surrounding the proposed Navenby substation are all designed to be able to export power to Bicker Fen and onward via the Viking link to Europe on demand. This is a business opportunity for these developers but it is in excess of the national need.

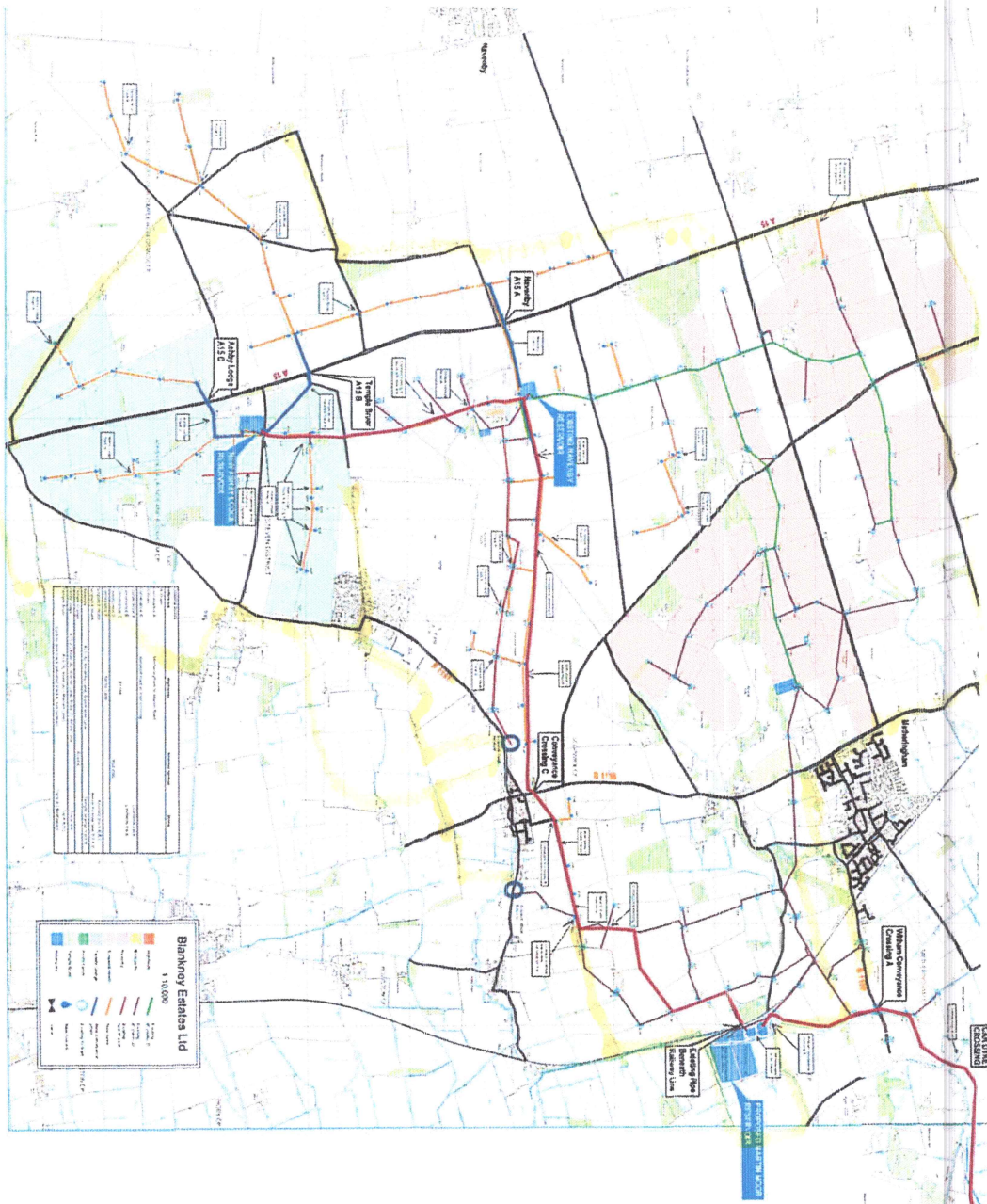
The Power from the generation at Hornsea 1,2,3 and 4 Windfarms it's transported to the National Grid substation at Grimsby where this power is then transported to the West Burton substation where it is transported via the 400 kV power lines that run across the Lincoln Heath that the Navenby substation is going to be connected into an onwards to be Bicker Fen substation where the Viking link is connected. The proposed solar farms both north and south of the City of Lincoln will fill the whole of this 400 kV line up with solar generated electricity hence there has to then be an alternative route to move power generation from the Hornsea wind farms to Bicker Fen and Walpole, hence the new power line that is required across the Lincolnshire Wolds from Grimsby to Walpole via Bicker Fen. The problem is this is not being published or known by either National grid or the developers.

I am aware that one of my colleagues has fully addressed the sequential test that the applicant/developer has supposedly carried out when comparing the lands east of the B1188 against other parts of the estate which is far closer to the proposed substation. Enclosed with this communication is a map of the Blankney Estates irrigation system that was printed from NKDC planning online website related to application number 13/0089/PNAGR, it shows all of the irrigated lands on the Blankney Estate south of Lincoln and I have highlighted areas on this map where alternative sites to the previously mentioned east of the B1188 could be substituted, also a smaller scale map showing approximately the lands Blankney Estates Ltd own and farm south of the City of Lincoln They would be replacing the lands east of the B1188 with drought prone heathland similar to the land that have been included for development on the Lincoln Heath in Ashby de la Launde and Temple High Grange parishes which have none of the issues previously mentioned and a lower quality of land. Bearing in mind the only area of Grade 1 land classification identified on the whole development is below and east of the B1188.

Kindest regards

John

John F Money MSc BSc (Hons) Dip Surv FCIOB



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North Arrow	True North
Legend	Red line: New Transfer Pipeline Blue line: New Brogaun Pipeline
Scale Bar	0 100 200 300 400 500 600 700 800 900 1000
Scale	1:10,000

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KEY	Red line: New Transfer Pipeline Blue line: New Brogaun Pipeline
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20 JAN 2010

13/0089 /

NEW WATER ABSTRACTION POINT STATION

BLANKNEY ESTATES LTD

LINCOLN HEATH WATER ABSTRACTION AND TRANSFER SCHEME

SCHEME LAYOUT

STUART MICHAEL ASSOCIATES

20 JAN 2010

13/0089 /

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STUART MICHAEL ASSOCIATES

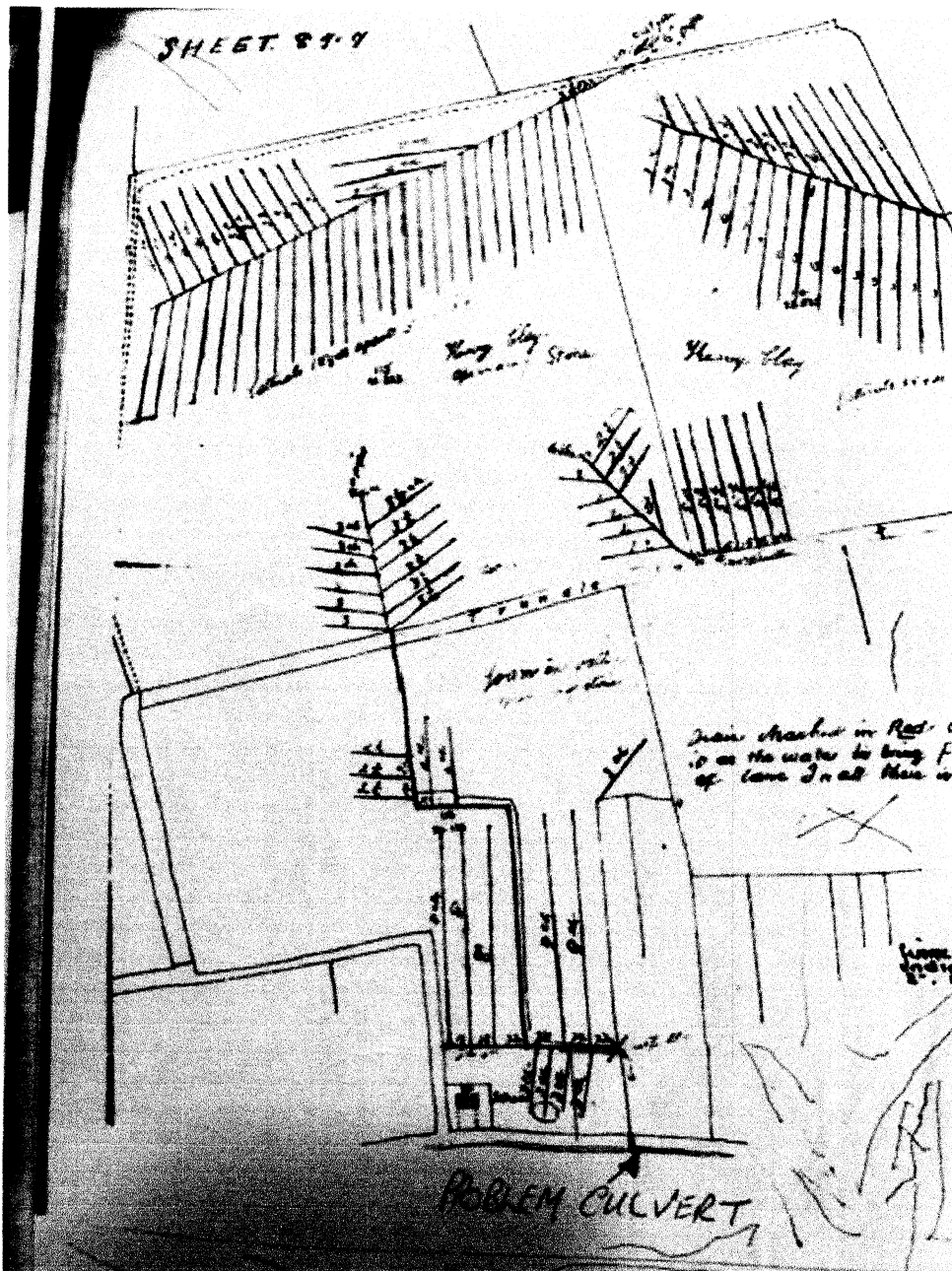
20 JAN 2010

13/0089 /

Flooding
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into the road
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caused by
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destroyed.



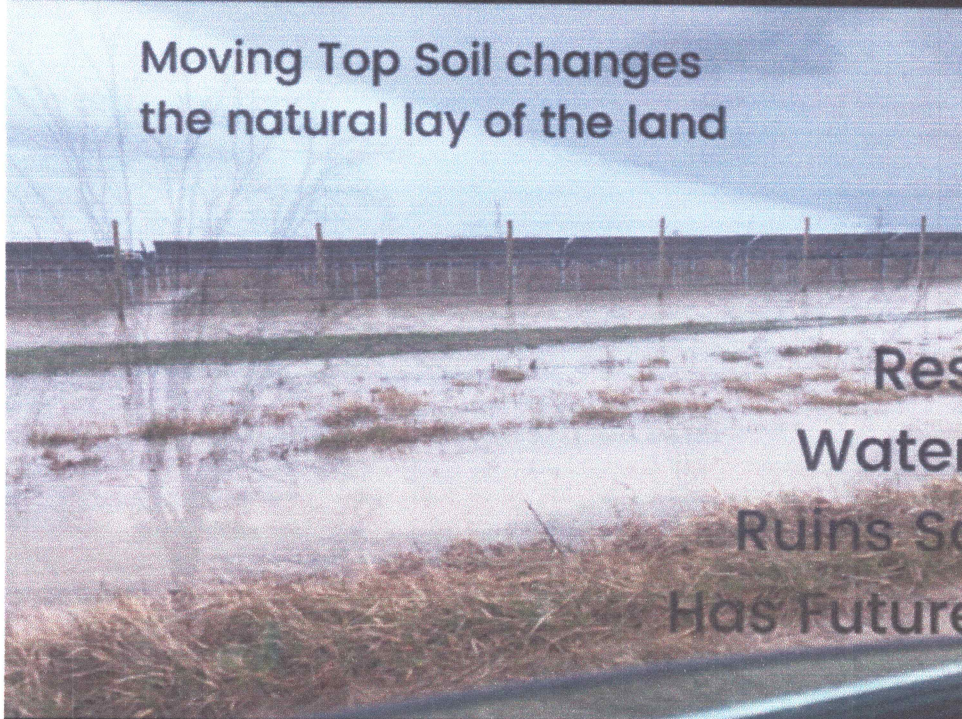
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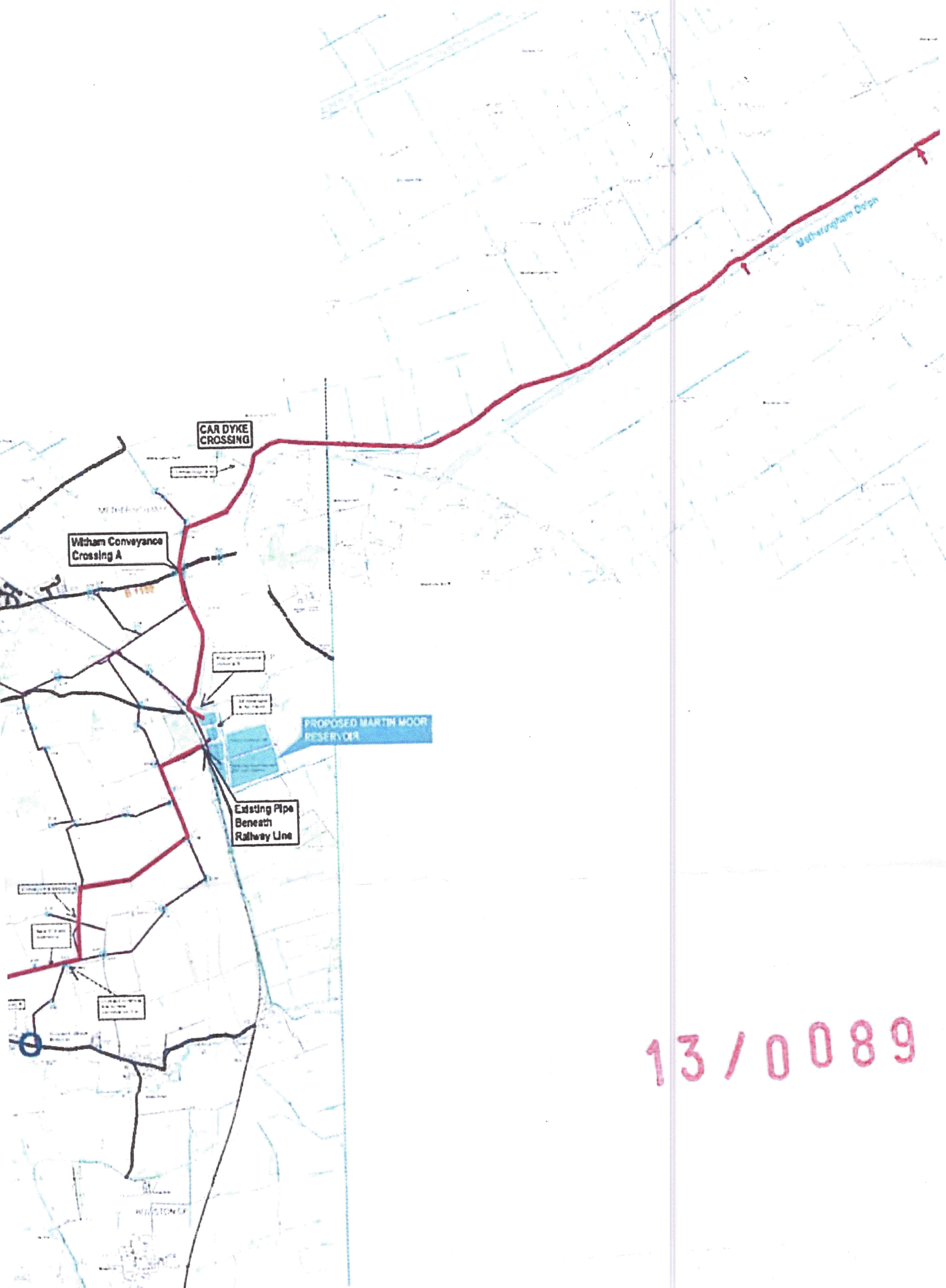
Images of a Solar Farm in the USA where the land drainage was destroyed by percussion piling



Moving Top Soil changes
the natural lay of the land



Resulting in
Water pooling
Ruins Soil Profile
Has Future Impact



13 / 0089

