

Submission ID: 37352

comments on the subjects of

- 1) Rochdale Envelope Approach
- 2) Sequential Test
- 3) Inadequacy of Visualisations

## Other Points

### Rochdale Envelope Approach

The applicant has relied heavily on the Rochdale envelope methodology when putting together its application. It is understood this is a commonly used framework however it is my assertion that it has been taken too far in this instance and is not meeting the guidelines of the governments NSIP advice note nine.

Some relevant extracts from advice note nine:

“the need to ensure that the significant effects of a Proposed Development have been properly assessed”

“the need for ‘flexibility’ should not be abused: This does not give developers an excuse to provide inadequate descriptions of their projects.”

“that there is consistency across the application documents”

“the assessment should be based on cautious ‘worst case’ approach: such an approach will then feed through into the mitigation measures envisaged [...] It is important that these should be adequate to deal with the worst case”

“The potential cumulative impacts with other developments will also need to be carefully identified such that the likely significant effects can be shown to have been identified and assessed”

“that the likely significant environmental effects from the Proposed Development have been properly assessed and presented in the ES”

“Applicants should make every effort to finalise details applicable to the Proposed Development prior to submission of their DCO”

General – It seems inconsistent and disproportionate that the colour pallet of a collector compound was discussed in some detail with the conclusion that this should be updated in the documentation yet something as massively significant such as the specification for batteries and panels, which have such a large effect on much of the other documentation, can simply be allowed to be decided later.

Fire – The types of battery in the BESS have not been specified therefore the worst case for fire and thermal runaway should have to be considered. There are lots of examples of BESS fires in this country and overseas so the worst case scenario is that a significant fire will occur, the fire and rescue services have insufficient water to deal with the fire, Springwell and fire and rescue staff are killed in the blaze, it will spread to other surrounding batteries, it will burn for many days, will produce toxic chemicals into the atmosphere as it does and fire-water used containing toxic chemicals will see its way into the water system polluting drinking water and wildlife habitats. Each of these eventualities should be explored as a worst case in its own right. It is encouraging that a further BESS plume assessment is being *reluctantly* undertaken by the applicant but each of the other scenarios need to be investigated in the same level of detail to prove that the worst case scenario has actually been fully considered. There is a reluctance for the applicant to engage with Lincolnshire Fire and Rescue to produce an agreed upon emergency response plan effectively meaning that Fire and Rescue are now waiting for this before being able to engage further in the

debate and the examination process. This must form part of the worst case scenario and should be produced during examination to fully engage the minds of the fire and rescue service and provide public scrutiny and thereby confidence in the plan. The current documentation is listing some bullet points that may be included in a future emergency response plan but this is insufficient as is the fact that Fire and Rescue are only due to be consulted with rather than agree the final document. The cumulative effects of the many other BESS applications both at the Navenby sub-station surrounding areas should be considered. Worst case methodology planning should cater for simultaneous fires at multiple facilities in the area.

Equipment Lifespan Assumptions – The type of battery and solar panels have not been specified although the theoretical panels to be used are supposed to have a lifetime of 40 years according to the applicant. This is significantly longer than any known panels on the market today with the majority stating around half that lifetime. The batteries follow a similar pattern with Springwell's life estimate being around double that of currently available units. These anticipated lifetimes have then been used in the assessments of waste production, construction, traffic, environmental impact etc. The estimates used do not follow the worst case principle which without specification of the equipment planned should be set to the lowest lifetime of the currently available options. This change should then, for reasons of consistency across documents, be cascaded throughout the application with each change having an effect on the particular impact assessment. The increased effect then needs to be considered cumulatively with that of all the other applications to get any true sense of the scale of that impact. I suspect the change could be considerable with things like lorry movements being doubled or trebled and the waste being produced being similarly increased. The applicant should be pushed to either specify the models of panels and batteries to be used so the lifespan and safety assumptions can be validated or amend the relevant documents to properly take account of the worst case and cumulative effects.

## Sequential Test

The sequential test for flood risk planning does not appear to have been followed with parts of the Springwell East proposed development area being in a flood risk zone.

The wording for the sequential test “there are no reasonably available, lower risk sites, suitable for the proposed development, to which the development could be steered.”

The test fails this point as there is suitable land available, with the same landowner

1. to the west of Springwell West
2. to the east of the A15 both to the north and south of inspection point 1 which was visited during accompanied site inspection 1 on 18<sup>th</sup> July 2025. It was pointed out to the inspectors during this visit that this land was available for use in the sequential test.

It is asserted that there is sufficient land available in these two identified areas to relocate the whole of Springwell East. This change, along with resolving the sequential test would have the following list of significant additional benefits:

1. The proposed alternate location is much nearer to the proposed Navenby and Springwell sub stations and its associated connection and BESS infrastructure
2. The significant cable route from Springwell East to Springwell Central which crosses the B1188 and is in the proximity of the high pressure fuel lines in that area would not be required.
3. The land category of the proposed alternative is of lower quality than that to the north of Scopwick.
4. There would be no construction traffic through the village of Scopwick as currently planned.
5. The route of the spires and steeples trail would be unaffected by the project.
6. There would be no need for a new dangerous access route to be created off the B1188 to the north of Scopwick.
7. The fragile clay drainage pipes situated to the north of Scopwick would not be damaged by piling, reducing the surface water flood risk.

This alternative approach should be seriously reviewed by the applicant as does seem to resolve many of the raised issues and without it the sequential test is not passed.

## Inadequacy of Visualisations

The applicant has provided many visualisations of the proposed project to show how hedging mitigation would grow over the years and how solar arrays might look in the future. There do not however appear to be any visualisations of:

1. Springwell Substation
2. BESS facility
3. Collector units
4. Roadside anti-glare hoardings
5. Construction compounds
6. HGV marshalling areas
7. Piling activities
8. Additional overhead power lines

On the accompanied site visit held on 18<sup>th</sup> July 2025 a visualisation of Inspection Point 2 – Toll Bar Cottage was provided. This visualisation failed to show the 12 metre high infrastructure that would be visible from that location. Other locations on the site visit show a now and then proposed visualisation showing how the trees / hedges may grow up etc. Clearly Springwell through it better not to show what the view from Toll Bar Cottage would be like in the future as no such visualisations were included.

I verbally stated that the visualisations were missing the large items of infrastructure at my visit to the phase one consultation meeting at Scopwick village hall on 1<sup>st</sup> Feb 2023. In my written response to the phase two consultation on 22 Feb 2024 I made these points again:

- i. Collector compounds up to 6 metres high are mentioned a number of times in the phase two consultation booklet which states there would be one in each of West, Central and East. The provided maps do not seem to show the Central and East locations. Where precisely are they planned to be situated?*
- j. Unlike other hardware there does not appear to be pictures of the proposed 6m high collector compound infrastructure. Can these be provided.*
- k. The visualisations in the presentation pack do not seem to show the collector compounds. These should be added to ensure a representative view is shown.*
- l. The picture shown on plate 2.9 in SPRI-01 shows an example battery storage facility. This example has less than 20 batteries (BESS containers). The proposal is for 1,150 containers. The picture is not representative of the visual impact of this proposed size of battery facility which is over 50 times bigger.*

It is my view that the more aesthetically displeasing items of infrastructure have been deliberately left out of visualisations to paint a more rosy picture of the development than is actually the case. Those consulted with have been deliberately misled. Even when this has been pointed out in both phase one and two consultations these visualisations have not been amended and are still not available. I believe the whole consultation process is called into question by these deliberate significant omissions. Further consultation meetings should have been set up with the corrected and complete visualisations available for review. To a lot of people relying on looking at the pictures is their main method of assessing the effect of the development, after all a picture is worth a thousand words they say.