

# Springwell Solar Farm

Draft Statement of Common Ground –  
Ministry of Defence  
(Tracked)

EN010149/APP/8.7.2

Version 2

Deadline 3

August ~~June~~ 2025

Springwell Energyfarm Ltd

Rule 8(1)(e)

Planning Act 2008

Infrastructure Planning (Examination  
Procedure) Rules 2010

# 1. Introduction

## 1.1. Overview

- 1.1.1. This Statement of Common Ground ('SoCG') has been prepared in respect of the application for the proposed Springwell Solar Farm Development Consent Order ('the Application') made by Springwell Energyfarm Ltd ('the Applicant') to the Secretary of State for Energy Security and Net Zero under section 37 of the Planning Act 2008<sup>1</sup> ('the 2008 Act').
- 1.1.2. Springwell Solar Farm ("Springwell") is a proposed new solar farm and battery storage facility located in North Kesteven, Lincolnshire. The proposals also include infrastructure to connect Springwell to the National Grid, as well as any necessary supporting site infrastructure and environmental mitigation, including landscaping and ecological planting ("the Proposed Development").
- 1.1.3. The SoCG is being submitted to the Examining Authority as an agreed draft between both parties. It will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.
- ~~1.1.3.~~ 1.1.4. This Statement of Common Ground, has been updated at Deadline 3 to reflect the latest position between the Parties.

## 1.2. Parties to this Statement of Common Ground

- 1.2.1. This SoCG has been prepared by the Applicant and the Ministry of Defence; Defence Infrastructure Organisation (MOD DIO).
- 1.2.2. The MOD DIO are a stakeholder for the Application.
- 1.2.3. The proposed development area occupies the statutory technical safeguarding zones that surround RAF Digby and the East 1 Wide Area Multilateration (WAM) Network.
- 1.2.4. The Proposed Development also occupies statutory aerodrome safeguarding consultation zones surrounding RAF Cranwell, RAF Waddington, RAF Coningsby and RAF Barkston Heath.
- 1.2.5. Collectively, the Applicant and the MOD DIO are referred to as 'the parties'.

## 1.3. Purpose of this document

- 1.3.1. This Statement of Common Ground ('SoCG') is being submitted to the Examining Authority as an agreed draft between both parties, as a response to pre submission engagement and response to the Relevant Representation. This SoCG is a 'live' document and will be amended as the examination progresses in order to enable a final version to be submitted to the Examining Authority.

- 1.3.2. The SoCG has been prepared in accordance with the Department for Levelling Up, Housing and Communities' Guidance on the examination stage for Nationally Significant Infrastructure Projects ('DLUHC Guidance')<sup>1</sup>.
- 1.3.3. Paragraph 007 of the DLUHC Guidance comments that:
- "A Statement of Common Ground (SoCG) is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at the examination focuses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority".*
- 1.3.4. The aim of this SoCG is, therefore, to provide a clear statement of the progress of discussions and agreement met or not yet met between the MOD DIO and the Applicant on matters relating to the Application.
- 1.3.5. The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and the MOD DIO.
- 1.3.6. The SoCG is intended to provide information for the examination process, facilitate a smooth and efficient examination, and manage the amount of material that needs to be submitted.
- 1.3.7. This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.3.8. Once finalised, the SoCG will be submitted to the Examining Authority concerning the Application under section 37 of the 2008 Act for an order granting development consent for the construction of the Proposed Development.

## 1.4. Terminology

- 1.4.1. In the table in the issues chapter of this SoCG:
- 1.4.2. "Agreed" indicates where an issue has been resolved.
- 1.4.3. "Not Agreed" indicates a position where both parties have reached a final position that a matter cannot be agreed between them.
- 1.4.4. "Under Discussion" indicates where points continue to be the subject of on-going discussions between parties.

---

<sup>1</sup> Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (30 April 2024).

## 2. Proposed Development Description

### 2. Introduction

- 2.1.1. The Proposed Development comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) array electricity generating facility with a total capacity exceeding 50 megawatts (MW), a Battery Energy Storage system (BESS) with an import and export connection to the National Grid.
- 2.1.2. The Proposed Development comprises the installation, construction and decommissioning works, with the details to be defined at detailed design and subject to approval by the Local Authority. The detailed design of the Proposed Development will be undertaken within the parameters assessed in the Environmental Statement (ES), which are secured through a range of control documents including the **Works Plans [EN010149/APP/2.3] [APP-007]**, the **Design Commitments [EN010149/APP/7.4] [APP-0138]** and the requirements set out in the **Draft Development Consent Order [EN010149/APP/3.1.32]**.
- 2.1.3. The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate. The location of the Proposed Development is shown in **ES Volume 2, Figure 1.1: Location Plan [EN010149/APP/6.2] [APP-058]** and described in **ES Volume 1, Chapter 2: Location of the Proposed Development [EN010149/APP/6.1] [APP-042]**, with the consideration of alternatives and the evolution of the design of the Proposed Development presented in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1] [APP-044]**.
- 2.1.4. The Proposed Development will be located within the 'Order Limits' (the land shown on the **Works Plans [EN010149/APP/2.3] [APP-007]** within which the Proposed Development can be constructed, operated and decommissioned). The extent of the Order Limits is shown on **ES Volume 2, Figure 1.2: Order Limits [EN010149/APP/2.1] [APP-058]**. The principal components of the Proposed Development include:
- Solar PV development including;
  - Ground-mounted Solar PV generating station. The generating station will include Solar PV modules and mounting structures;
  - Balance of Solar System (BoSS), which comprises inverters, transformers, and switchgear;
  - 400kV Grid Connection Corridor to connect the Springwell Substation and proposed National Grid Navenby Substation;
  - Satellite Collector Compounds comprising switchgear, transformers, ancillary equipment and operation, maintenance, security and welfare units;

- A project substation (the 'Springwell Substation') compound, which will include substation, Main Collector Compound, switching and control equipment, office/control/welfare/security buildings, storage areas, and provisions for vehicular parking and material laydown;
- BESS compound, including batteries and associated inverters, transformers, switchgear and ancillary equipment and their containers, enclosures, monitoring systems, air conditioning, electrical cables, fire safety infrastructure and operation, maintenance, security and welfare facilities;
- Underground cabling will connect the Solar PV modules and BESS compound to the BoSS, Collector Compounds, and the Springwell Substation;
- Ancillary infrastructure works, including boundary treatments, security equipment, earthing devices, fencing, lighting, earthworks, surface water management, internal tracks and any other works identified as necessary to enable the Proposed Development;
- Landscaping, habitat management, biodiversity enhancement and amenity improvements; and
- Works to facilitate vehicular access to the Order Limits

## 3. Record of Engagement

### 3.1. Summary of consultation

- 3.1.1. The Applicant has engaged with MOD DIO throughout the DCO Application process, including during early stages of the design and environmental assessment of the Proposed Development. **Table 1** shows a summary of key engagement that has taken place between the Applicant and NE in relation to the DCO Application.
- 3.1.2. This records formal engagement with MOD DIO and excludes local engagement with RAF Digby direct regarding the practicalities or arranging site surveys in close proximity to the RAF base boundary, and a consultation event at RAF Digby on 8th February 2024.
- 3.1.3. The Applicant has separately engaged with the MOD on Crown Land within the Order Limits, and is progressing separately all relevant agreements and consents.

**Table 1 – Record of Engagement<sup>2</sup>**

Date	Form of correspondence	Key topics discussed and key outcomes
Pre Submission 2023 / 2024	Consultation	The MOD DIO issued a formal response to both the Non Statutory and Statutory Consultation
Pre Submission 2024	Meetings, Email Correspondence, Phone Calls	Following Statutory Consultation the parties have had frequent engagement prior to the DCO Application being submitted. This engagement was focused mainly on technical and aerodrome safeguarding comments. The Applicant shared additional detail, to allow the MOD DIO to undertake further safeguarding assessments. The Applicant agreed, prior to submission, to remove five fields comprising Solar PV arrays as per the MOD DIO Statutory Consultation response.
Acceptance 19 <sup>th</sup> December 2024	Email	Notification by Applicant that the DCO Application has been submitted and Accepted by PINS.
Pre-Examination Feb 2025	Relevant Representation	MOD DIO response as an Interested Party for the Examination <a href="#">[RR-278]</a>

<sup>2</sup> This table is not intended to be a record of every call or email exchanged between the parties (for example emails organising meetings) but should record the key exchanges of information and meetings.

Date	Form of correspondence	Key topics discussed and key outcomes
Pre Examination January – April 2025	Email Correspondence, Phone Calls	The Parties continued engagement on the matters raised pre submission and the latest position within the Relevant Representation, and how to incorporate into the Proposed Development.
21 <sup>st</sup> March 2025	Meeting	The Parties discussed the Relevant Representation, and any required updates to the DCO application documents to reflect the MOD DIO's position and agreed to continue to engage on those changes
16 <sup>th</sup> May 2025	Meeting	The Parties discussed the proposed amendments to the Application, to address the MOD DIO Relevant Representation, prior to Deadline 1.
22 <sup>nd</sup> May 2025	Email	Additional information around the technical safeguarding zone, and additional controls shared by the MOD DIO.

**June / July 2025**    Emails

Email correspondence between the parties on dDCO Requirement wording, -(safeguarding zone 'T' plans), and sharing draft documents prior to Applicant submission at Deadline 2

## 4. Current Position

### 4.1 Position of the Applicant and the Ministry of Defence (MOD DIO).

- 4.1.1. The following tables set out the position of the Applicant and the MOD DIO, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.
- 4.1.2. As noted above, this is a ‘live’ document, with matters that have yet to be agreed upon between both parties. The intention is to provide a final position in subsequent versions of the SoCG, addressing and identifying where changes have been made, and ultimately, documenting agreement by both parties on relevant points.
- 4.1.3. The MOD DIO Relevant Representation [\[RR-278\]](#) response states “*In summary, at this point in time, the MOD maintains no statutory safeguarding objections to the proposed development subject to any DCO being amended as requested above and including the Requirements that are set out in this letter.*” Agreed amendments by the Parties, are detailed below:

**Table 2 - Topics Discussed**

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
1	Technical Site Safeguarding Zone – Proximity to RAF Digby	MOD DIO state due to proximity to RAF Digby, it remains possible that the deployment of cranes, high reaching plant equipment or temporal structures that may be used during the construction and decommissioning phases of the proposed development, may cause an obstruction to the effective operation of the technical installations at RAF Digby. It will therefore be necessary for any DCO that may be granted to contain a requirement for a construction management plan to be submitted prior to construction and decommissioning works being undertaken.	<p><del>The Parties have agreed to include the requested</del><u>The requested provisions and</u> Works Management Plan components <u>are contained</u> within the <b>oCEMP [EN010149/APP/7.7.2]</b>, <del>the</del> <u>and oDEMP [EN010149/APP/7.13.2]</u>, <del>and the</del> <u>and for the Applicant to issue an updated version to the ExA. In addition, the Applicant will also amend the oOEMP [EN010149/APP/7.10.2] to include the requested Works Management Plan components during the operational stage, for maintenance / asset replacement. These updates expect to be which were</u> submitted at Deadline 2.</p> <p>The MOD <del>DIO will</del> <u>has been</u> defined as a Consultee to the CEMP, OEMP and DEMP, within an updated version of Schedule</p>	<b>Agreed</b> (pending formal review of revised documents, issued to the ExA)

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
			<p>2 <u>Requirements</u> of the <b>Draft DCO [EN010149/APP/3.1.2]</b>, <u>submitted at Deadline 1</u>.</p> <p>This topic is deemed to be principally agreed, pending <u>MOD DIO final review of revised submitted documents to the ExA finalisation of the Requirement wording, proposed to be updated at Deadline 4</u>.</p>	
2	EMF/EMC Interface	No development shall take place unless or until such time as an Electrical Noise Interference Management Plan (ENIMP) has been submitted to, and approved in writing by, the relevant planning authority in consultation with the Ministry of Defence	<p><del>The Parties continue to discuss how to incorporate the MOD DIO request into the DCO, and the technical interface details.</del></p> <p>The Applicant <del>expects to</del> <u>has included</u> a new Requirement <u>20</u> in Schedule 2 of the <b>Draft DCO [EN010149/APP/3.1.2]</b> that requires an ENIMP to be prepared and approved by the relevant Planning Authority, in consultation with the MOD <u>DIO</u>. <del>A working new Requirement has been included in the revised draft DCO to be submitted at Deadline 1.</del></p> <p>The ENIMP will cover the construction and operational phases of the authorised development, to ensure the development does not impact MOD operations.</p> <p>The Parties are progressing discussions, <u>for finalisation of the Requirement wording, proposed to be update</u> <del>included</del> <u>included in the Draft DCO [EN010149/APP/3.1.2] at Deadline 4, of final Requirement wording to be finalised in the draft DCO to the ExA, during the Examination stage.</u></p>	Under Discussion
3	Aerodrome Safeguarding – Birdstrike Hazard	MOD DIO Relevant Representation response dated 14 <sup>th</sup> Feb 2025 states “Accordingly, the MOD considers it necessary that	<p><del>The Parties have agreed to include</del> the requested provisions <u>within are included in the latest the oLEMP [EN10149/APP/7.9.2]</u> and the</p>	Agreed (pending review of formal review of revised

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
		provision is made in any DCO that may be granted to ensure that the MOD is consulted upon the siting, design and management of any ponds, swales, surface water drainage systems, storm water attenuation systems including storage basins and channels or other wetland features that may be included in the development, to ensure these will not introduce a birdstrike hazard to aircraft operating at RAF Barkston Heath, RAF Cranwell and RAF Waddington."	<p><b>Flood Risk Assessment: Appendix A - Outline Drainage Strategy [EN010149/APP/7.16.3].</b>  <del>The Applicant has issued an updated version of these documents, to the ExA at Deadline 1, which were submitted at Deadline 1.</del></p> <p>The MOD <del>DIO will be</del>has been defined as a Consultee to the LEMP and Drainage Strategy, within an updated version of Schedule 2 <u>Requirements</u> of the <b>Draft DCO [EN010149/APP/3.1.2].</b>  <b>submitted at Deadline 1.</b></p> <p>The LEMP and Drainage Strategy will include the specific design detail in relation to drainage elements,  <del>prior to commencement,</del>  <u>approved by the relevant Planning Authority, in consultation with the MOD, prior to commencement of the authorised development.</u></p> <p>This topic is deemed to be principally agreed, pending <u>finalisation of the Requirement wording, proposed to be updated at Deadline 4.</u>  <del>final review of revised submitted documents to the ExA at Deadline 1.</del></p>	documents, issued to the ExA)
4	Glint and Glare	Relevant Representation response states, "The applicant has undertaken a glint and glare study which has assessed possible impacts upon the relevant receptors at these aerodromes. The assessment has identified that no major impacts will be caused. Accordingly, the MOD has no safeguarding concerns or requirements in this respect."	The Applicant welcomes confirmation within the Relevant Representation response that the MOD <u>DIO</u> has no safeguarding concerns in relation to the potential for Glint and Glare, following the full assessment included within the DCO Application.	Agreed
5	Technical Site Safeguarding	Relevant Representation response states, "The layout scheme submitted entails PV	The Applicant welcomes confirmation within the Relevant Representation	Agreed

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
	Zone – Proximity to RAF Digby	arrays and associated infrastructure being located approximately 620 metres from the boundary of RAF Digby... During pre-application engagement with the applicant, the MOD DIO identified concerns that the extent of the proposed development in proximity to the southern boundary of RAF Digby would introduce structures that would impact upon the effective operation of technical installations located there. The applicant has taken this issue into account and amended the layout plans for the proposed development now submitted.”	response, that the MOD DIO agrees with the updated design included in the DCO Application and proximity of Solar PV within the revised scheme to RAF Digby, having regard to the MOD DIO Statutory Consultation response.	
6	Aerodrome Safeguarding – Height Safeguarding Zones	MOD DIO Relevant representation response dated 14 <sup>th</sup> Feb 2025 states, “Based upon the information submitted about the general layout and scale of the proposed development, it will not cause any physical impacts upon aerodrome height safeguarding requirements.”	The Applicant welcomes confirmation within the Relevant Representation response that the scheme causes no physical impacts for Height Safeguarding Requirements.	Agreed

## Signatures

This statement of Common Ground is agreed upon:

On behalf of the MOD.DIO

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:

DRAFT