

Springwell Solar Farm

**Draft Statement of Common Ground –
Lincolnshire County Council**

EN010149/APP/8.1.2

Deadline 3

Revision 2

August 2025

Springwell Solar Energy Farm Ltd

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1. Introduction

1.1. Overview

- 1.1.0. 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 ("PA 2008").
- 1.1.1. Springwell Solar Farm 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").
- 1.1.2. This 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.

1.2. Parties to this Statement of Common Ground

- 1.2.0. This SoCG has been prepared by the Applicant and Lincolnshire County Council ('LCC'). LCC is the county council that governs the non-metropolitan county of Lincolnshire in England. The Applicant has had ongoing engagement and discussion with the Lincolnshire Fire and Rescue team, who are part of the Lincolnshire County Council, and they are the responding fire and rescue service covering the Proposed Development. Therefore, the Applicant has prepared a separate SoCG with Lincolnshire Fire and Rescue Service, which is in **Appendix 1** - Statement of Common Ground - Lincolnshire Fire and Rescue Service.
- 1.2.1. Collectively, the Applicant and LCC are referred to as 'the parties.'
- 1.2.2. The matters of interest discussed with the LCC are detailed in **Section 4** of this SoCG.

1.3. Purpose of this Document

- 1.3.0. This Statement of Common Ground ('SoCG') is being submitted to the Examining Authority as an agreed draft between both parties. 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.
- 1.3.1. 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')¹.
- 1.3.2. 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

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

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”.

- 1.3.3. The aim of this SoCG is, therefore, to provide a clear position of the progress and agreement met or not yet met between LCC and the Applicant on matters relating to the Application.
- 1.3.4. The document will be updated as more information becomes available and as a result of ongoing discussions between the Applicant and LCC.
- 1.3.5. 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.
- 1.3.6. 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’s website. (<https://national-infrastructure.consenting.planninginspectorate.gov.uk/projects/EN010149/documents>)
- 1.3.7. This SoCG includes responses to topics raised within LCC’s Relevant Representation submitted on the 10 February 2025. The issues that have been raised within the Relevant Representation by LCC have been responded to within this SoCG, rather than duplicating the responses within the **Responses to Relevant Representations [EN010149/APP/8.13]**[REP1-070]. Further issues were raised through the Local Impact Report and Written Representation made by LCC. The Applicant has responded to this point within **Response to Deadline 1 Submissions, [EN010149/APP/8.20]** [\[REP2-023\]](#). Ongoing engagement through the examinations on all these matters has been documented below within this statement.
- 1.3.8. Once finalised, the SoCG will be submitted to the Examining Authority under section 37 of the PA 2008 for an order granting development consent for the Proposed Development.
- 1.3.9. For the purposes of examination, this SoCG addresses the following key topic areas:
 - Ecology and Biodiversity;
 - Fire Safety;
 - Grid Connection;
 - Cultural Heritage;
 - Cumulative Effects;
 - Public Health and Wellbeing;
 - Landscape and Visual Impact;
 - Best and Most Versatile Agricultural Land and Soils;
 - Population;
 - Public Rights of Way and Permissive Footpaths;
 - Traffic and Transport;
 - Waste;
 - Water Environment, Surface Water, Flooding and Drainage; and

- Draft Development Consent Order.

1.4. Terminology

- 1.4.0. This SoCG summarises the main topics covered and the status of the matter. The colour coding system used within the table in **Section 4** has been outlined below.

Cell	Status
	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of on-going discussions between the parties.
	Not Agreed - indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

2. The Proposed Development

2.1. Proposed Development Description

- 2.1.0. 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 Electricity Transmission.
- 2.1.1. 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 required to be undertaken within the parameters assessed in the Environmental Statement, 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/3.1.2] [APP-012].
- 2.1.2. 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 **Environmental Statement (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].
- 2.1.3. 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/6.2] [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 engagement

- 3.1.0. The Applicant has engaged with LCC throughout the Development. Consent Order 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 LCC in relation to the Application.
- 3.1.1. The Applicant built long-term working relationships with LCC officers. This included holding regular meetings focused on planning and communications, scheduled fortnightly, from the close of Phase One Consultation on 7 March 2023 to the submission of the Application, as referred to in Appendix B2 - Stakeholder Engagement Undertaken outside of Formal Consultation. These fortnightly meetings continued through the pre-examination phase and into the examination period.
- 3.1.2. The primary purpose of the Planning and Communications meetings was to provide regular updates on the progress of the Proposed Development (including consultation and engagement activities), collect feedback on the evolving plans and highlight any concerns to ensure these could be addressed proactively through the design and assessment process.

Table 1 – Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
30 March 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Headlines from phase one consultation and next steps Approach to notifying communities of survey works
27 April 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Agreement of approach to consultation on draft SoCC, following email on 12 April 2023 to ask for preferred approach (timings and preference for informal consultation). Agreement that a draft SoCC would be provided for informal feedback and discussed at a dedicated meeting following Scoping.
11 May 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Ward councillor engagement Update on planned resident design workshops
25 May 2023	Meeting with Highways Team	<ul style="list-style-type: none"> Discussion about the preferred road network to be utilised for construction traffic. Discussion about approach to traffic surveys and quantity. Agreement of location of Automatic Traffic Counts and Manual Classified Counts surveys. Initial feedback suggested that there should not be an absolute constraint in terms of road network capacity, however there should be focus on managing the timing of

		construction activities to minimise impacts on local road networks and communities in the area.
01 June 2023	Landscape and Design Meeting	<ul style="list-style-type: none"> Introduced the approach to good design the use of design principles Initial meeting via AAH Consultants regarding viewpoints and photomontage locations for LVIA to be agreed with North Kesteven District Council and Lincolnshire County Council.
13 June 2023	Site Meeting with AAH Consultants	<ul style="list-style-type: none"> Discussion of viewpoints and photomontage locations for LVIA.
29 June 2023	AAH technical memorandum 2 (AAH TM02)	<ul style="list-style-type: none"> Comments on viewpoints and photomontage locations for LVIA.
03 July 2023	Landscape Meeting with AAH Consultants	<ul style="list-style-type: none"> Discussion on viewpoints and photomontage locations for LVIA
07 July 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Feedback on residential design workshops
31 July 2023	Email	<ul style="list-style-type: none"> Consultation on air quality assessment approach. The suggested assessment approach was accepted by North Kesteven District Council on behalf of Lincolnshire County Council.
03 August 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Confirmation of timing of informal consultation period on draft SoCC.
15 August 2023	AAH technical Memorandum 3 (AAH TM03)	<ul style="list-style-type: none"> Confirmation that the LVIA viewpoints proposed for the PEIR were acceptable. Requested that all viewpoint photography should be taken in accordance with LI TGN 06/19: Visual Representation of Development Proposals. Requested that a methodology for the visualisations to be provided. Discussion about the study area for LVIA and AAH TMO3 confirmed that the study areas proposed were appropriate subject to justification being presented in the LVIA and confirmation of there being no significant effects beyond these distances. Landscape Character Areas described in the North Kesteven Landscape Character Assessment were discussed in early meetings and AAH TMO3 confirmed that LCA 6 (Lincoln Cliff) and LCA 13 (Fenland) could be scoped out subject to inclusion of a brief statement in the LVIA that recognises their proximity

		to the Order Limits and justification for their exclusion being presented in the LVIA.
16 August 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Discussion on contents of the draft SoCC, following issue on 04 August 2023. Topics discussed included the boundary of the inner zone, locations of the deposit points, the location and timings of public events, seldom heard groups and date of formal SoCC consultation
14 September 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Update on design approach and design principles (copy of design principles issued post-meeting) Discussion on key changes made to the draft SoCC ahead of formal consultation (15 September – 13 October 2023) to take into account feedback from host authorities. Key changes included: <ul style="list-style-type: none"> Revising the boundary of the inner zone to follow a 2-kilometre buffer around the proposed Site boundary, extending in some areas to consider the wider effects of the Proposed Development. Changing the location of a deposit point from Waddington Bar Library to The Venue, Navenby because it was less distant from the proposed Site. Adding an additional public event at The Venue, Navenby. Discussion on ecology surveys undertaken and biodiversity design. North Kesteven District Council Ecologist agreed with the revised assessment of receptors to be scoped in and those to be scoped out on the proviso that wintering bird surveys and notable arable flora surveys should be carried out. The number of wintering bird survey visits could be curtailed if findings justify.
02 November 2023	Planning and Communications Meeting	<ul style="list-style-type: none"> Discussion on matters arising from formal consultation on the draft SoCC. Key changes following formal consultation included: <ul style="list-style-type: none"> Moving four public events forward to week 2 of the consultation to give consultees more time to engage before the end of the consultation period. Update on timings for phase two consultation
11 January 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> Launch of phase two consultation
23 January 2024 to 13 June 2024	Meeting	<ul style="list-style-type: none"> Monitoring visits to the trial trenching and remote sign off of trenches as completed.
08 February 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> Update on progress of phase two consultation

08 February 2024	Landscape and Design Meeting	<ul style="list-style-type: none"> Update on LVIA and design principles.
19 February 2024	Correspondence: AAH technical Memorandum 4 (AAH TM03)	<ul style="list-style-type: none"> Discussions about the proposed National Grid Navenby Substation, extent of overhead lines and fencing and CCTV., Request that the Environmental Statement clearly set out the parameters of the development, such as heights and locations of elements that have been used in the assessment, and the assessment be based on a 'worst-case' scenario. Discussion regarding the LVIA including policy to be discussed, level of detail and approach to reporting effects. Confirmation of the methodology and assessment criteria and requested that where 'moderate' effects are considered to be 'not significant' a brief justification to be provided.
29 February 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> Key headlines from phase two consultation
03 April 2024	Email	<ul style="list-style-type: none"> Sought advice on the air quality assessment year of early decommissioning, following receipt of statutory consultation comments from North Kesteven District Council. North Kesteven District Council on behalf of Lincolnshire County Council confirmed the assessment year of early decommissioning at year 20.
04 April 2024	Landscape and Design Meeting	<ul style="list-style-type: none"> Discussion regarding Landscape Visual Impact Assessment content of the Environmental Statement. Discussion about matters from AAH technical Memorandum 4 (AAH) dated 19 February 2024 and highlighted above.
12 April 2024	Meeting with Highways and PRow Team	<ul style="list-style-type: none"> Discussion about Public Right of Way (PRow) and permissive path proposals. Discussion and agreement on approach to diversion and closure during construction. Discussion an agreement about provision of PRow improvement locations and measures, along with permissive path locations and routes.
29 May 2024	Meeting with Highways Team	<ul style="list-style-type: none"> Presentation of the summary of the assessment parameters relevant to the EIA and transport assessments. Agreement of the Information inclusive of the proposed construction stage working hours, trip generation/distribution, future year assessments; access locations and mitigation and improvement proposals. Discussion about the A15/B1202 pursuant to Lincolnshire County Council's improvement proposals in this location.
31 May 2024	Meeting	<ul style="list-style-type: none"> Discussion about agricultural land classification survey outputs with North Kesteven District Council and Landscape,

		<p>who are acting on behalf of North Kesteven District Council and Lincolnshire County Council as their soils specialist.</p> <ul style="list-style-type: none"> • Discussion of the summary of the soil types across the Site and survey results, alongside approach to the design development and consideration towards Best Most Versatile land. • Discussion about feedback from PEIR, with particular reference to the production of a figure to show the agricultural land classification grades overlaid with the Zonal Masterplan and approach to land taken out of agricultural use.
June 2024	Email	<ul style="list-style-type: none"> • Discussion about the need to undertake a Mineral Safeguarding Assessment as part of the pre-application engagement that will form part of an appendix to the Planning Statement.
19 June 2024	Landscape Meeting	<ul style="list-style-type: none"> • Further discussion regarding Landscape Visual Impact Assessment content of the Environmental Statement and to discuss final viewpoint selection for the LVIA
26 June 2024	Email	<ul style="list-style-type: none"> • Sought agreement on the changes on the scope of the air quality construction phase dust risk assessment. Changes were accepted by North Kesteven District Council on behalf of Lincolnshire County Council.
26 January 2024	Email to Lead Local Flood Authority	<ul style="list-style-type: none"> • Email outlining the proposed drainage strategy and requesting to provide any guidance on discharge rate proposals and whether there was a preference for the use of Sustainable Drainage System.
27 June 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> • Approach to targeted consultation
08 July 2024	Meeting with Lincolnshire Road Safety Partnership	<ul style="list-style-type: none"> • Discussion on the use of International Road Assessment Programme star rating protocols.
10 July 2024	AAH technical Memorandum 5 (AAH TM05)	<ul style="list-style-type: none"> • Confirmation that the final viewpoint selection for the LVIA was acceptable and agreed.
11 July 2024	Email from AAH Consultants	<ul style="list-style-type: none"> • Confirmation that the photomontage locations for the LVIA were agreed.
11 July 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> • Update on proposals for targeted consultation
23 July 2024	Meeting	<ul style="list-style-type: none"> • Discussed the findings of ecological surveys and further scheduled surveys to be carried out in Summer 2024.

		<ul style="list-style-type: none"> • Suggestions about notable arable flora surveys were made to consider survey of maize fields as they are late sown crop and arable plants can emerge after summer rain. • Discussed design updates with regards to proposals for removal of sections of Local Wildlife Site (LWS) calcareous grassland road verges. North Kesteven District Council considered that the LWS road verges were not of high quality, therefore had considers that seeding and improved long term management could improve the quality. • Discussions about Biodiversity design. North Kesteven District Council noted a potential risk to barn owls and deers crossing the A15 due to habitat enhancement proposals.
12 August 2024	Meeting with Highways Team	<ul style="list-style-type: none"> • Discussion about proposed improvements to the highway.
22 August 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> • Key headlines from targeted consultation • Discussion on AoCM • Cumulative Assessment and discussion on the long and short lists
August / September	Emails discussing the short and long list criteria and the cumulative assessment	<ul style="list-style-type: none"> • Email Correspondence and meeting to discuss and agree the short and long list that are assessed within the cumulative assessment.
12 September 2024	Planning and Communications Meeting	<ul style="list-style-type: none"> • Update on design approach including the use of design principles, response to feedback and the mechanisms by which good design will be secured via Control Documents in the draft DCO (including discussion of Design Commitments).
4 October 2024	Highways Draft DCO and schedules Meeting	<ul style="list-style-type: none"> • Discuss the Highways, schedules, and side agreements, plus, some initial feedback from LCC
5 March 2025	Archaeological and trial trenching Meeting	<ul style="list-style-type: none"> • Project update on dates and status • Results of trenching and scope of outline WSI for post-DCO additional trenching and mitigation
5 March 2025	Highways Meeting	<ul style="list-style-type: none"> • Discussion on remaining highway points.
2 April 2025	Built Heritage Meeting	<ul style="list-style-type: none"> • Discuss around Built Heritage Assessment and the scope of works • Levels of harm to listed buildings and conservation areas

3 April 2025	Socio-economic, Employment, Skills and Supply Chain Meeting	<ul style="list-style-type: none"> Discuss around the outline Employment, Skills and Supply Chain Plan, including objectives and themes Further Stakeholder Engagement
9 April 2025	PRoW Meeting	<ul style="list-style-type: none"> Discuss the submitted PRoWPPMP and comments received from LCC PRoW officer Discuss the relevant Project Principles / Design Commitments
16 April 2025	Ecology and Biodiversity Meeting	<ul style="list-style-type: none"> Discuss around the BNG calculation and watercourses units Discuss around the potential need for an Ecology Steering Group, the BNG monitoring fee and the biodiversity enhancement fund
17 April 2025	Archaeological trial trenching Meeting	<ul style="list-style-type: none"> Discuss the approach to archaeology and associated relevant representation comments.
30 April 2025	Built Heritage Meeting	<ul style="list-style-type: none"> Discuss the assessment of the built heritage assets with particular reference to Scopwick Mill, Scopwick and Blankney conservation areas, Temple Farmhouse and Thompson's Bottom Farm.
2 May 2025	Highways Meeting	<ul style="list-style-type: none"> A15 / B1202 Junction: Discussion on enhanced CTMP measures to suppress single occupancy staff movements A15 / B1202 Junction: Proposal to place embargo on staff movements between 0700-0900hrs and 1600-1800hrs through the junction A15 / B1202 Junction: Proposal to limit HGV traffic to 5 HGV movements per hour per direction through the junction in peak hour periods A15 junction works: Agreement to provide a Stage 1 Road Safety Audit for proposed works A15 Road works: Discussion on how to provide technical approval process for LCC on A15 works. Such works to be delivered via the CTMP
15 May 2025	Ecology and Biodiversity	<ul style="list-style-type: none"> Discussion on outstanding matters on BNG, Ecological Steering Group, and points within the SoCG
19 June 2025	Discussion on s106 and side agreements	<ul style="list-style-type: none"> Discussion about matters to be secured through a section 106 and potential draft Head of Terms, for example, look at the previous one approved by the Councils.
19 June 2025	Meeting with NSIP Archaeologist and Historic England	<ul style="list-style-type: none"> Discussion of wording of Requirement 11, if this is extended to cover all works packages it was agreed that the oWSI should specify a framework for each work package Discussed approach to updates to outline WSI, agreed that the document would cover an updated strategy for post-DCO evaluation to inform the detailed design which would identify

areas for evaluation but not to the level of detail of individual trench locations.

- Agreed that the updated oWSI would include rationale for selecting areas for evaluation to assist in production of site specific WSIs for evaluation.
- Suggested areas for targeted post-DCO evaluation and updated oWSI text to be shared via email ahead of follow up call scheduled for 1st July.

1 July 2025	Meeting with Built Heritage, NSIP Archaeologist and Historic England	<ul style="list-style-type: none"> • Built heritage officer to review response on Scopwick Mill, Thompson's Bottom Farm and Scopwick and Blankney Conservation Areas – Historic England confirmed that they were happy with the changes made to the Order Limits following the initial consultation layout. • Further discussion of suggested areas for additional evaluation post-DCO. • Agreed that technique(s) to be used will vary by area depending on the specific questions to be answered • Draft evaluation areas plan and draft updated oWSI to be shared after the call for review and comment.
8 July 2025	Landscape and visual meeting	<ul style="list-style-type: none"> • to establish and clarify matters of agreement/disagreement relating to landscape and visual effects, the oLEMP, landscape mitigation and design. • It was acknowledged that there were relatively few areas of disagreement between the parties. Various matters were discussed/clarified.
8 August	Meeting with NSIP Archaeologist	<ul style="list-style-type: none"> • Discussion on the draft oWSI that was shared with LCC prior to the meeting

4. Current Position

4.1. Position of the Applicant and LCC

- 4.1.0. The following tables set out the position of the Applicant and LCC, following a series of meetings and discussions with respect to the key areas of the Proposed Development. This includes matters where discussions are ongoing.
- 4.1.1. As noted above, this is a 'live' document, and some aspects 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.

Table 2 – Ecology and Biodiversity

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
2-1	Statutory Consultation / Section 42 response	Approach to assessment	LCC note that a number of receptors are proposed to be scoped out of assessment despite the Scoping Opinion requesting these to be scoped in.	Since Phase Two Consultation, there have been changes to which receptors have been scoped out of the assessment due to design updates and further consultation. Following Phase Two Consultation, the Applicant agreed on the list of receptors to be scoped in and out for the ES with LCC and NKDC. Receptors scoped in and out are discussed in ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1.2] [REP1-024] .	Agreed
2-2	Email Correspondence	Hedgerows and trees	LCC consider that the assessments of impacts undertaken on hedgerows and trees are appropriate noting the predicted impacts on hedgerows and trees. LCC consider that the mitigation proposed is appropriate.	<p>A hedgerows survey has been carried out and is presented in ES Volume 3, Appendix 7.11: Important Hedgerows Survey [EN010149/APP/6.3] [APP-092]. The assessment of impact on hedgerows and hedgerow trees is discussed in ES Volume 1, Chapter 7: Biodiversity [EN010149/APP/6.1.2] [REP1-024].</p> <p>An Arboricultural Impact Assessment has been carried out, with a tree root zone protection plan presented in ES Volume 3, Appendix 7.12: Arboricultural Impact Assessment [EN010149/APP/6.3] [APP-093]. The Outline Construction Environmental Management Plan (oCEMP) [EN010149/APP/7.7.3] [REP2-015] also details mitigation measures to avoid</p>	Agreed

				impacting habitats, including hedgerows and trees.	
2-3	Relevant Representation	Impacts on statutory and non-statutory designated sites	There are no internationally important sites designated for biodiversity within 10km of the proposal and no nationally important sites designated for biodiversity with 2km of the Order limits. A Habitats Regulation Assessment report [APP-0150] has been prepared which assesses potential pathways for Likely Significant Effects on the Wash SPA/Ramsar/SAC and concludes that there are none and that an Appropriate Assessment is not required. LCC agrees with the Applicant's conclusion however, The Planning Inspectorate will need to satisfy itself that sufficient information has been submitted by the Applicant to enable this conclusion to be reached.	A search for designated sites was originally undertaken in April 2022, followed by update searches to include additional areas added to the survey area scope in 2023 and 2024. The searches were used to inform the ES Volume 3, Appendix 7.1: Preliminary Ecological Appraisal [EN010149/APP/6.3][APP-082] for the Proposed Development and to inform the Habitat Regulation Assessment – No Significant Effects Report [EN10149/APP/7.17] [APP-0150] .	Agreed
2-4	Relevant Representation	Biodiversity Net Gain	Given the scale and nature of the proposed development LCC will expect the project to deliver significantly more than 10% Biodiversity Net Gain (BNG). The Applicant has set out their broad approach to BNG in APP-095. This document identifies the opportunities of the Scheme to	As set out in section 2.4 of ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3.2] [REP1-032] , the trading rules set minimum habitat creation and enhancement requirements to compensate for specific habitat losses, up to the point of no net loss. They are based on the habitat type and distinctiveness of the lost habitat. Losses of higher distinctiveness	Under discussion

deliver BNG and states that the document will be updated when the design of the scheme is finalised. However, based on current plans, the Scheme is predicted to result in a net gain of 31.66% for area-based habitat units, and 20.68% for hedgerow units.

LCC notes the updates made to the Applicant's BNG Assessment [REP1-033] and is pleased to see that the Trading Rules within the Statutory Biodiversity Metric are now being met.

LCC also notes that the updated BNG assessment predicts that a gain of 13.59% watercourse units will be delivered alongside the previously anticipated gains of 31.66% area based habitat units and 20.68% hedgerow habitat units.

The Applicant has indicated that gains at approximately these levels will be secured with a Requirement in the DCO. LCC supports this course of action.

habitats require replacement of the same habitat type to satisfy the trading rules while losses of lower distinctives can be replaced by similar or better habitats. The trading rules have been followed throughout the Biodiversity Net Gain Assessment.

As demonstrated in **ES Volume 2, Figure 3.3: Green Infrastructure Parameters [EN010149/APP/6.2] [APP-060]** which is secured through the **Outline Landscape and Ecological Management Plan (oLEMP) [EN010149/APP/7.9.2] [REP1-060]**, the approximately 15km of new hedgerow planting proposed has not identified which proportion of the new planting will have either a ditch or bank associated with it – this is the reason why the trading rules are not currently met as the new hedgerow planting has not indicated this which gives the extra distinctiveness required.

For the baseline, the total length of hedgerows within the Order Limits of high distinctiveness is c. 1.66km. To satisfy the trading rules, the final green infrastructure will need to deliver:

- a. Create 0.03km (30m) of native hedgerow with trees - associated with a bank or ditch (moderate condition).
- b. Enhance 0.02km (20m) of existing native hedgerows with trees -

				<p>associated with a bank or ditch from moderate to good condition.</p> <p>The oLEMP [EN010149/APP/7.9.2] [REP1-064] and the final detailed LEMP will be updated to document and thereby secure commitment to ensure that the above length of hedgerow is delivered, and the trading rules are met.</p> <p>With regards watercourse units the Morph Surveys (river condition assessment) has now been completed indicating that enhancements in the riparian zone, as outlined in ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3.2] [REP1-048] and the oLEMP [EN010149/APP/7.9.2] [REP1-064] will deliver a 13% gain in watercourse units primarily through reduction in encroachment within the riparian zone.</p> <p>The draft DCO [EN010149/APP/3.1.3] has been updated at Deadline 3 to secure the gains outlined in the ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3.2] [REP1-048].</p>	
2-5	Relevant Representation	Engagement	<p>LCC encourages the applicant to continue to make progress with this work to provide clarity around what the project will deliver for biodiversity at the earliest possible stage. LCC also encourages the Applicant to work with other</p>	<p>The Applicant is committed to delivering biodiversity net gain (BNG) and is actively working to identify opportunities in collaboration with other developers and stakeholders in the area. We welcome continued engagement with LCC and look</p>	Agreed

			<p>developers and stakeholders in the area to identify opportunities to deliver BNG strategically. LCC welcomes ongoing engagement with the Applicant in relation to BNG.</p>	<p>forward to further discussions to refine and enhance our initiatives.</p>	
				<p>As set out in the oLEMP [EN010149/APP/7.9.2] [REP1-064] , Following completion of construction, monitoring of all habitats being created and enhanced for the delivery of biodiversity net gain will be undertaken in years 1, 2, 3 and 5, 10, 15, 20, 25 and 30 against the BNG Metric target habitat types and condition.</p>	
2-6	Meeting	Ecological Steering Group	<p>LCC confirms that positive discussions have been held between the Applicant, LCC and NKDC in relation to establishing the proposed ecological steering group.</p> <p>LCC also notes the applicant's intention to update the oLEMP at deadline 3. LCC will review the updated documents when submitted.</p> <p>The Council suggests that consideration is given to the establishment of an Ecological Steering Group or similar for the Proposed Development. This group should consist of key ecological stakeholders (both statutory and non-statutory). The remit of the group would be to</p>	<p>The Applicant is currently in discussion with both LPAs to understand the terms of reference under which a steering group would be administered.</p> <p>The oLEMP [EN010149/APP/7.9.2] [REP1-064] is to be updated for deadline 3, which will outline how the ecological steering group will be established and how the group will function as part of this Proposed Development.</p>	<p>Under discussion</p>

receive updates on project progress and to advise on issues encountered during construction as well as to refine delivery of required mitigation and enhancement measures. Meetings should be held at an appropriate frequency to ensure good communication between both the developer and stakeholders.

Establishing such a group is also likely to yield benefits by assisting with the identification of opportunities for strategic working with other solar NSIP developers in the vicinity. This is particularly the case in relation to the delivery of BNG where strategic delivery could result in significant benefits for species groups such as ground nesting birds.



Table 3 – Fire Safety

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
3-1	Relevant Representation	Draft DCO	LCC notes that a financial contribution is required via the Protective Provision within the DCO to the Fire Service so that it has sufficient resources in	Protective Provisions for the LFRS have been included within Schedule 15 of the Draft DCO [EN010149/APP/3.1.2] [REP1-006] submitted at Deadline 1. The	Under Discussion

places to undertake monitoring of the BESS connected to this project.

LCC notes the applicant's intention to update the draft DCO and will provide any comments, as necessary, once it has been reviewed.

Applicant has now been informed of the amount of funding required and confirms that it is agreeable to the proposed sum. The applicant will update the protective provisions in this respect in the next revision of the draft DCO, in line with the approach taken at Heckington Fen.

Table 4 – Grid Connection

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
4-1	Relevant Representation	Environmental impact	LCC identified a potential risk of negative environmental impacts from the Springwell development commencing without the benefit of generation being secured.	It is not unusual for renewable energy projects to be consented separately from the grid connections required to connect them to the National Grid Energy Transmission network. As set out in paragraph 3.3.12 of the Site Selection Report [EN010149/APP/7.2.2] [AS-018] , the National Grid TEC register identifies up to 4.2GW of connection offers at Navenby substation which represents a significant contribution to the required increase in solar energy to help reach the Government's target of tripling solar generation by 2030 and helping set a realistic path for the UK towards achieving Net Zero by 2050. Such infrastructure would therefore have a strong	Under Discussion

policy case in its favour. National Grid have advised that there are 8 committed connections at the new Navenby Substation.

National Grid has established the Horlock Rules to ensure that the design and siting of new substations (and extensions to existing substations) give due regard to the preservation of amenity and take reasonable steps to mitigate the effects of its proposals. This includes consideration of residential amenity and keeping intrusion into surrounding areas to a reasonably practicable minimum. Given the strong need case for the new substation and that following the Horlock Rules should ensure that impacts are mitigated, there is a good prospect of planning permission being granted.

The application for the Navenby substation and associated powerlines to connect it into the National Grid transmission network would be determined in accordance with the Development Plan and any material considerations, which include the NPPF and the NPSs (EN1, EN3 and EN5). The Central Lincolnshire Local Plan was adopted in April 2023 and Policy S16: Wider Energy Infrastructure states that: "The Joint Committee is committed to supporting the transition to net zero carbon

future and, in doing so, recognises and supports, in principle, the need for significant investment in new and upgraded energy infrastructure. Where planning permission is needed from a Central Lincolnshire authority, support will be given to proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region, which could include: energy storage facilities (such as battery storage or thermal storage); and upgraded or new electricity facilities (such as transmission facilities, sub-stations or other electricity infrastructure.” The policy goes on to state that any such proposals should take all reasonable opportunities to mitigate any harm arising from such proposals and take care to select not only appropriate locations for such facilities, but also design solutions (see Policy S53) which minimises harm arising. It is clear therefore that the Development Plan supports the provision of the Navenby substation (and any associated lines necessary to connect it to the network) in principle. On the basis that National Grid will be following the Horlock Rules, it should be possible to satisfy the requirements of this policy. NPS EN1, EN3 and EN5 will also be important material considerations in any decision. This includes that the new substation would be defined as CNP infrastructure, for which there is an urgent national need. The

starting point in favour of CNP infrastructure (as set out in the **Planning Statement [EN010149/APP/7.2.2] [AS-018]** paragraphs 3.2.3-3.2.6) would also apply as a material consideration to the application for the Navenby substation.

As noted above, the need case for a new substation to serve up to 4.2GW of renewable energy projects is strong. Given the level of new renewable energy projects to reach Net Zero by 2050 and Clean Power by 2030, new grid infrastructure will be needed (see **Statement of Need [EN010149/APP/7.1][APP-0135]**). Given the application of the Horlock Rules and the strong policy position in favour of new renewable energy development (as Critical National Priority Infrastructure, which is confirmed in 4.11.4 of NPS EN1) there is no obvious reason to believe that consent would not be granted. The new pylons are required to divert the existing OHL into the new substation. For the same reasons, there is no obvious reason why consent would be withheld.

Full weight can therefore be afforded to the benefits to be delivered by the Proposed Development.

4-2	Email Correspondence	Grid Connection date	LCC are concerned about the certainty and timings of grid	The Applicant commenced discussions with National Grid Electricity Systems Operator (NGESO) in November 2020 and a grid	Under discussion
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connection and deliverability of the Springwell project. Further clarity is required on how the two projects would align.

connection offer was made in December 2021 (as set out in the **Site Selection Report, Appendix 1** of the **Planning Statement [EN010149/APP/7.2.2]** [[AS-018](#)]). Since the receipt of the grid connection offer, the Applicant has worked closely with NGESO to determine where a new substation may be located and to understand programme for its delivery. The Applicant's most recent understanding is that a planning application for Navenby substation will be made in October 2025, but welcomes confirmation on this from National Grid. National Grid confirmed that despite the later submission date planned for the planning application, they still expect to be able to connect the project to the National Grid in late 2029, as set out in the grid connection offer.

The Applicant has set out their position on Grid Connection Date and Commencement, in response to NKDC's LIR, in Table 2-2 of Response to **Deadline 1 Submissions [EN010149/APP/8.20]** [[REP2-023](#)].

As set out in the **NGET Responses to ExQ1 [REP1-092]**, NGET is currently analysing feedback and refining the proposals ahead of the proposed submission of its planning application to the local planning authority for the substation in Early 2026. A planning decision is expected

in Spring 2026. Subject to the approval of such application, construction work is expected to begin in mid-to-late 2026, with a currently anticipated completion date of the construction in late 2029.

NGET noted that the delivery of the substation and associated infrastructure is completely dependent on whether permission is granted by the Council. That is therefore outside of NGET's control.

Table 5 – Cultural Heritage

Ref	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
5-1	Relevant Representation	Approach to assessment regarding Designated Heritage Assets	LCC agrees with the defined study areas for above ground heritage assets, specifically the use of a 5km study area for designated heritage assets and 2km for non-designated heritage assets, as set out in the Archaeological Desk-Based Assessment and Stage 1 Setting Assessment (ES Volume 3, Appendix 9.1).	Further engagement with Historic England regarding designated heritage assets (including built heritage assets) is continuing and further engagement with the LCC and NKDC Conservation Officers regarding built heritage assets, listed buildings, conservation areas and locally listed buildings will also continue.	Agreed

5-1a	Relevant Representation and Subsequent Discussions	Designated and non-designated Heritage Assets	However, LCC does not currently agree with a number of decisions to scope out specific receptors from further assessment. These include both designated and non-designated heritage assets where LCC considers there is potential for impact on setting, group value, or historic landscape character.	For these assets there is remaining disagreement regarding the level of harm (magnitude of impact) and as a result the significance of effect.	Under Discussion
5-2	Relevant Representation and Subsequent Discussions	Listed Buildings	LCC are concerned with the exclusion of nearly all listed buildings within the 1km study area. However, we disagree with the assessment of Scopwick Mill and Thompson's Bottom Farmhouse. We maintain these assets should be scoped into the ES.	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/6.3.2] [REP1-038] along with the rationale for including or excluding them from the assessment. T Scopwick Mill (LBEN 1280676) is a mid 19 th century brick tower mill it survives to six storeys but the cap and sails are missing. The building derives significance from its architectural and historic interest as a post-medieval windmill, though the internal mechanism and floors were lost before 1992 and the attached former mill buildings had also been largely demolished by this time. The mill was converted to residential use between 2002 and 2005 when the internal floors to the tower were reinstated and new attached buildings in the style of the former mill structures were added. There are other examples locally of similar tower mills but	Under Discussion

Scopwick is the tallest. It is experienced as a prominent landmark feature particularly from the west and on the approaches along the road between Scopwick and Digby. In these views the agricultural surroundings, particularly the arable fields, provide appropriate context to the historic mill. The topmost floor of the tower has a window facing northwest, whilst the other floors have windows facing southeast as well and the third stage of the tower (above the modern replacement to the attached buildings) has an external platform encircling the tower – also a modern replacement. These upper floors provide further more expansive views of the surrounding agricultural landscape. The agricultural landscape provides appropriate context to the historic mill and contributes to its significance. The design of the Proposed Development has sought to minimise the effect of the solar farm on the contribution that this landscape makes to the significance of the listed building by “pulling back” to southeast of a slight ridgeline that lies southeast of the mill. The closest solar arrays will therefore be over 400m southeast of the mill, there will be no panels to the northwest, panels to the northeast would be beyond Scopwick and panels to the southwest would be further away still. The Proposed Development is considered to result in a slight impact to the significance of the listed building (less than substantial harm) which is

not significant, and it was therefore scoped out of the ES.

Thompson's Bottom Farmhouse (LBEN 1254329/ 1254407) comprises a 19th century farmhouse and separately listed range of farm buildings (stables and coach house) to the northwest (rear) of the farmhouse. To the east of the farmhouse is a non-listed barn and the access to the farmyard at the rear which contains other non-listed outbuildings including large agricultural sheds. These buildings provide context to the farmhouse as part of a working farm. East of the farmyard access are two non-listed cottages. The farm sits on the north side of Warren Lane, with the farmhouse set back beyond a small garden separated from the lane by a tall hedge. This hedge, the adjacent buildings, tree belts to the west and north of the farm and a small block of woodland to the south of Warren Lane opposite the farm serve to screen the listed buildings from view until in immediate proximity. The farm complex as a whole is experienced within a wider agricultural landscape and can be glimpsed on the approach along Warren Lane from the east. This setting provides appropriate context to the farmhouse and outbuildings. The Proposed Development extends to within 150 m of the farmhouse (for improvements to Warren Lane) with the closest arrays c. 300 m to the east of the farmhouse, a line of

existing electricity pylons crosses the fields and Warren Lane at this point. Arrays will be present to the north and south of Warren Lane on the approach to the farmhouse but will be screened by proposed new hedgerow planting (**ES Volume 4 Visualisations: Part 6 Viewpoints 29b, 29c, and Part 7 Viewpoint 35 [EN010149/APP/6.4] [APP-132]**). The character of this eastern approach to the farmhouse will become more enclosed as a result of this planting, though it should be noted that there are the remains of a dry stone wall to the north side of the lane which indicate that the view was likely not always as open as it is presently. The alteration to the character of the wider surroundings around the farmhouse will slightly reduce the contribution that the setting makes to the significance of the listed buildings. This would result in an effect of minor significance and not significant and these buildings were therefore scoped out of the ES.

5-2a	Relevant Representation and Subsequent Discussions	Listed Buildings	Further discussion with the applicant on 2 and 30 April have resolved a number of issues, this included Ashby Hall, Temple Church Tower and Temple Farmhouse.	Ashby Hall (LBEN 1061827) is a small country house dating to the early 16 th century and late 18 th century with later alterations and additions. It is associated with a separately listed ice house (LBEN 1261470) and walled garden (LBEN). Ashby Hall is experienced within landscaped grounds containing these associated structures to the north, a large pond to the east and significant mature trees	Agreed
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to the boundaries. It is approached via a driveway from the south. There are limited views of the wider landscape and the nearest solar arrays would be over 1.2 km to the west and over 1.1 km to the north (beyond the walled garden) and the ZTV does not predict visibility of the arrays from the house. The ice house is experienced only within the grounds of the hall and derives significance from its architectural interest as a well preserved example and its group value with the house, as such the contribution of setting to its significance is confined to this immediate area. The walled garden derives significance from the architectural and historic interest in its unusual octagonal plan form and the surviving adjoining buildings which have been converted to residential use. It also has group value with the hall as an ancillary building to the country house. The garden is experienced on the northern edge of the former grounds of the hall with other garden buildings to the north which provides an appropriate context to the walled garden. The wider agricultural setting is appreciated from the outside of the walled garden due to this area being more open, As with the hall the closest solar arrays would be over 1 km distant, the ZTV predicts visibility from the walled garden though this will be filtered by vegetation. The impact of changes in the wider landscape at this range would have a negligible impact on the significance of the

house, ice house and walled garden. These assets were therefore scoped out of the ES.

Temple Farmhouse (LBEN 1254328 and 1261359) comprises a 17th century farmhouse with late 18th, early 19th and 20th century alterations and the remains of the 13th century church tower which was restored in the early 20th century. The tower is all that remains above ground of the Knights Templars Preceptory which was abandoned at the dissolution in 1538 and is also designated as a scheduled monument. The farmhouse derives significance and its principal reason for designation as a grade II listed building from the architectural and historic interest in its fabric as an example of post-medieval farmhouse and the associative value for it being on the site of the Knights Templar's Preceptory. A small fragment of reused medieval tracery survives in an upper window on the north gable of the farmhouse and the building is likely to incorporate other stonework from the preceptory adding to the architectural and historic interest of the building. The farmhouse is experienced within a farm complex of non-designated buildings with the listed and scheduled tower to the north, the presence of the tower in proximity to the farmhouse contributes to the associative historic interest and value of the farmhouse. The tower derives significance from the architectural and historic interest in

				<p>its fabric, its associative value with the Knights Templar and archaeological interest and evidential value as a surviving remnant of a pre-Dissolution church. The nearest solar arrays to the farmhouse and tower will be over 1km to the east. The ZTV (ES Figure 10.5a) indicates that there is no visibility of the Proposed Development from Temple Farmhouse due to a slight ridge to the east of the farmhouse. LVIA Viewpoint 32 is taken from east of this ridge and shows limited visibility of the Proposed Development. The change to the wider agricultural surroundings beyond areas where the farmhouse is appreciated is considered to result in a slight impact (less than substantial harm) which is not significant. 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.</p>	
5-3	Relevant Representation and Subsequent Correspondence	Assessment of impacts	<p>The assessment of impacts is generic and non-specific, referring to likely impacts rather than conclusions based on evidence from archaeological evaluations. This will result in a substantial amount of assessment post-DCO and a reactive approach to protecting</p>	<p>The industry accepted best practice as set out in the CIFA/IEMA/IHBC guidance “Principles of Cultural Heritage Assessment” is to understand the heritage significance of the assets. The EIA has done this through mainly non-intrusive methods so as to minimise the loss of archaeological remains pre-determination. Intrusive investigation</p>	<p>Under Discussion</p>

archaeology instead of the recommended pre-determination evaluation, which is the industry-accepted best-practice approach. This approach is acceptable for above ground heritage and for those below-ground areas where development impacts are known and trenching has been undertaken.

For areas where design impacts remain unknown or unconfirmed until detailed design has been completed, non-intrusive assessment only will provide a basic limited understanding, and the assessment should acknowledge that there will be a substantial risk of unknown archaeological remains being present that have not been identified by the non-intrusive methods.

Further works of a non-intrusive nature have been agreed, comprising metal detecting and field walking, which will enhance our understanding of the archaeological potential and inform further stages of work, if required, once detailed designs are submitted and areas if impact identified.

focused on the elements of the Proposed Development which have the least flexibility, whilst the design sought to minimize impacts on identified areas of archaeological interest. Further investigation to inform the detailed design is proposed and secured in the **Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]** and is in line with the approach taken for other DCO solar farms. Engagement is ongoing with Lincolnshire County Council on the detail in the **Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]**.

5-4	Relevant Representation	Conservation Areas	LCC are concerned with the scoping out of conservation areas of	The 8 conservation areas within 5km of the Site have been included individually in the	Agreed
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	and Subsequent Correspondence		Scopwick and Blankney, from the ES. Changes to views or the environment around them should be examined, as excluding these areas from detailed assessment risks overlooking potential harm to these assets and diminishing their sense of place for the communities they serve. However, we accept that the level of harm proposed to Scopwick and Blankney is likely to be less than substantial.	gazetteer to ES Volume 3, Appendix 9.1: Archaeological Desk- Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [REP1-038] along with the rationale for including or excluding them from the assessment. This includes Scopwick and Blankney conservation areas. The masterplan has only a short section of solar arrays on one side of the PRoW between Blankney and Scopwick which minimizes the impact on the two conservation areas. Fields south of Blankney will not contain any solar arrays or other infrastructure thereby maintaining views of the Church of St Oswald, Blankney. LCC and Historic England are agreed that the effects on Scopwick and Blankney conservation areas have been greatly reduced by the changes to the Order Limits and masterplan since the initial consultation.	
5-5	Relevant Representation	Historic Farmsteads	The assessment of Historic farmsteads fails to consider their collective value, how these farmsteads are experienced as a group with shared historic associations that define the rural distinctiveness. Large-scale infrastructure risks severing these connections and a comprehensive assessment is essential.	As set out in Table 9.3 of ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1] [AS-012], the agricultural land use around the assets contributes to their significance as historic farmsteads. However, the change in setting is not considered to result in significant effects. The assessment of setting has been carried out in accordance with Historic England and IEMA/CIFA/IHBC Guidance. Wider landscape considerations have been addressed in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050] and	Under Discussion

			<p>have informed the design of the Proposed Development to minimise the effects of severing connections between the farmsteads and settlements.</p> <p>ES Volume 3, Appendix 9.1: Archaeological Desk- Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.3] has been updated at Deadline 3 to include further information on the collective value of historic farmsteads.</p>	
5-6	Relevant Representation and Subsequent Correspondence	Designated and non-designated heritage assets	<p>LCC consider at this stage that the ES lacks robust evidence to support some of its conclusions and fails in some areas to address the potential impact on the historic environment. LCC urge the applicant to expand the assessment to include a comprehensive analysis of designated and non-designated heritage assets and their settings.</p> <p>Assets 1km should be assessed on a case-by-case basis, informed by their significance and the contribution of setting. Where assets are scoped out, justification should be clearly evidenced, beyond what is currently provided in the DBA.</p> <p>This approach applies to both designated and non-designated assets. While LCC maintains this</p>	<p>ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1] [AS-012] is supported by the following evidence appendices presented in ES Volume 3:</p> <ul style="list-style-type: none"> • Appendix 9.1: Archaeological Desk-Based Assessment and Stage 1 Setting Assessment [[EN010149/APP/6.3.2] [REP1-038]; • Appendix 9.2: Geoarchaeological Deposit Modelling Report [EN010149/APP/6.3] [APP-098]; • Appendix 9.3: Aerial Investigation Report [EN010149/APP/6.3] [APP-099]; • Appendix 9.4: Geophysical Survey Report [EN010149/APP/6.3] [APP-100] – [APP-105]; and • Appendix 9.5: Archaeological Trial Trenching Report [EN010149/APP/6.3] [APP-106].

Under Discussion

			<p>position, we defer to Historic England and North Kesteven District Council's Judgement on the adequacy of the assessment for designated assets.</p> <p>The applicant has submitted evidence for archaeological potential and significance which is heavily drawn from non-intrusive methods and therefore is generic and unfocussed at this stage. Discussions with the Applicant have been undertaken and a commitment has been made for further work post-DCO and detailed designs stage to test their accuracy and to inform the final an archaeological mitigation strategy and management plan strategy . This refinement post-DCO is needed as site specific impacts are unknown at this stage in time.</p>	<p>The Applicant considers that the baseline evidence for the ES is robust and that the ES has considered all likely significant effects.</p> <p>Assets beyond 1km from the Order Limits are not anticipated to experience significant effects, based on an appraisal of how their setting contributes to their significance and the ZTV which shows limited visibility at this range. 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/6.3.2] [REP1-038] along with the rationale for including or excluding them from the assessment.</p> <p>Historic England have not raised any concerns regarding the scope of the setting assessment and are in agreement with the conclusions with regard to the assets in their remit.</p>	
5-7	Relevant Representation and Subsequent Correspondence	Adequacy of works	<p>LCC has concerns over the adequacy of works undertaken for Springwell to establish an appropriate and effective baseline. LCC considers the works undertaken fall short of acceptable standards and fail to meet the requirements set out by the National Planning Policy</p>	<p>The following data sources have been used to understand the existing cultural heritage baseline conditions following the relevant ClfA Standards and Guidance:</p> <ul style="list-style-type: none"> • Designation data from the NHLE, downloaded from the Historic England website on 24 August 2022 and 2 	Under Discussion

Framework (NPPF), EIA Regulations and National Policy Statement (NPS) EN-1.

LCC acknowledge that the Applicant has accessed all the required sources as per the Lincolnshire Archaeology Handbook. Our concerns regard the assumption that all areas of archaeological activity have been identified, and their significance known from purely non-intrusive methods within an agricultural landscape with little prior archaeological survey. The fact that further trenching is needed demonstrates our understanding of the presence and significance of archaeological remains is partial at present and therefore this limitation should be recognised within the Applicants submission.

February 2024 and descriptions of designated heritage assets viewed on the Historic England website;

- Archaeological and architectural records from the National Record of the Historic Environment, viewed through the Heritage Gateway website;
- Aerial photographs in the Historic England Archive and other readily available sources;
- National Mapping Programme;
- Archaeological records held by Lincolnshire HER;
- Historic Landscape Characterisation;
- Historic maps and plans held in the Lincolnshire archive;
- Environment Agency Lidar data;
- Geological data available online from the British Geological Survey;
- Portable Antiquities Scheme data;
- Relevant internet sources;
- Readily available published sources and unpublished archaeological reports;
- A geoarchaeological desk-based assessment (**ES Volume 3, Appendix 9.2: Geoarchaeological Deposit Modelling Report [EN010149/APP/6.3] [APP-098]**);
- Aerial investigation and mapping (**ES Volume 3, Appendix 9.3: Aerial Investigation Report [EN010149/APP/6.3] [APP-099]**);

- **Geophysical surveys of the Site (ES Volume 3, Appendix 9.4: Geophysical Survey Report [EN010149/APP/6.3] [[APP-100](#) – [APP-105](#)]); and**
- **Report on targeted trial trenching within the Site (ES Volume 3, Appendix 9.5: Archaeological Trial Trenching Report [EN010149/APP/6.3] [[APP-106](#)]).**

The Applicant considers that information submitted meets the requirements of the NPPF, NPS EN-1 and NPS EN-3, and provides an adequate baseline for the assessment of impacts including the potential for currently unknown archaeological remains.

The phased approach to assessment, utilising a suite of techniques to build upon and inform one another, is comparable with other DCO solar farm schemes. Large amounts of pre-determination trenching are not supported by guidance or by the ethical principle of minimizing harm to the historic environment. Historic England support an approach that minimizes unnecessary physical interventions to archaeological remains.

The Outline Written Scheme of Investigation details a programme of works to inform the detailed design and mitigation for

				archaeological remains and this can be secured through draft DCO Requirements 5 and 11. Mitigation for archaeological remains will either be through design changes to avoid impacts (micro siting / exclusion zones or use of non-intrusive foundations) or through excavation where avoidance is not necessary or desirable. The scope of work set out within the Outline Written Scheme of Investigation is under discussion.	
5-8	Relevant Representation and Subsequent Correspondence	Engagement on Methodology	LCC do not have concerns over the methodology used, rather we have concerns over its implementation in determining significance and impact through extrapolation from predominantly desk-based and non-intrusive methods and not direct physical data from intrusive evaluation. As stated previously, this is a limitation that should be expressly recognised and stated within the Applicants submissions.	The criteria used for determining archaeological heritage significance (the importance of heritage assets), magnitude of impact and the significance of effect follow the IEMA/CIFA/IHBC guidance and were set out in the Scoping Report no concerns regarding this methodology were raised in the Scoping Opinion. The methodology for the EIA has followed these criteria.	Under Discussion
5-9	Relevant Representation and Subsequent Correspondence	Language	<p>LCC considers the assessment has been based on predominantly non-intrusive surveys and limited archaeological evaluation to ground truth the non-intrusive work.</p> <p>Given that impacts will not be known until the post-DCO detailed design has been completed, extrapolating from the partial data and drawing</p>	Archaeological evaluation (as defined in the CIFA Standards and Guidance) comprises both intrusive and non-intrusive methods. Non-intrusive evaluation (geophysical survey, analysis of aerial photographs, Lidar, historic mapping and existing records) has been carried out for the whole of the Order Limits. This was supplemented with areas of intrusive evaluation. Together this suite of evaluation techniques have identified areas	Under discussion

conclusions is acceptable. Still, at this stage, only indicative and may need ground truthing, with the further stages of work being set out in an oWSI, which is currently under discussion between the Applicant, LCC and Historic England. There is a recognition that further investigation is needed, and the methodology for the further works has been agreed in principle, and the scope of works will be finalised once detailed design is complete.

of high archaeological potential within the Order Limits and areas where the archaeological potential is considered to be lower. The archaeological sites identified within the Order Limits are likely to be of small settlements of Iron Age or Roman date based on their form and relationship with previously identified remains. As such they may contribute to regional research aims but would not be equivalent in importance to Scheduled Monuments. They are therefore considered to be of low to medium importance based on their complexity, or the potential for evidence of other periods. This will be investigated further through the post-DCO additional trial trenching to inform the detailed design.

5-10	Relevant Representation and Subsequent Correspondence	Aerial Photography	LCC are concerned that the level of aerial investigation and mapping survey has not been as comprehensive as is standard practice. This can only be seen as a missed opportunity to make best use of available resources and produce a comprehensive assessment. Further assessment works including metal detecting and field walking will provide some greater understanding of the archaeological potential.	A total of 433 vertical aerial photographs and 131 oblique aerial photographs representing all those available within the 1km study area were examined in the Historic England Archives in Swindon. No cropmarks or other features of potential archaeological interest were visible on the majority. Copies were made of 13 for the purposes of transcribing features for ES Volume 3, Appendix 9.3: Aerial Investigation Report [EN010149/APP/6.3] [APP-099] and included in the references for the report.
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Under discussion

<p>5-11 Relevant Representation and Subsequent Correspondence</p>	<p>Trial Trenching</p>	<p>LCC have concerns regarding the amount of trial trenching undertaken within the 1280 hectare site. The Applicant has completed 196 trenches, each 50m by 1.8m. The trenching thus represents slightly over 0.1% of the full redline boundary. Nearly 99.9% of the site has not been evaluated. Where trenching has been done, these have been restricted to five specific small areas only, albeit to an acceptable standard.</p> <p>The Applicant has taken a proportionate approach to trenching and committed to undertaking further trenching post-DCO and once detailed design has been completed. The scope of works has yet to be finalised but the methodological approach has broadly been agreed.</p> <p>LCC will be guided by the detail which is yet to be provided by the Applicant and will use and the bespoke research-led objectives being formed in the draft oWSI as</p>	<p>The Applicant considers that ES Volume 3, Appendices 9.1: Archaeological Desk Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [REP1-038], 9.2: Geoarchaeological Deposit Modelling Report [EN010149/APP/6.3][APP-098], 9.3 Aerial Investigation and Mapping [EN010149/APP/6.3][APP-099] 9.4: Geophysical Survey Report [EN010149/APP/6.3][APP-100-105] and 9.5: Archaeological Trial Trenching Report [EN010149/APP/6.3][APP-106] together provide sufficient information on the archaeological potential of the Order Limits and likely impacts resulting from direct impacts and changes to the setting of heritage assets to inform the application.</p> <p>Potential large areas of topsoil strip (Substation, Collector Compounds and BESS) have been evaluated through trial trenching in accordance with a Written Scheme of Investigation approved by LCC.</p> <p>Cabling, access tracks and drainage will be subject to detailed design secured under a DCO Requirement and the Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148] sets out mitigation measures for known archaeological remains and provides a</p>	<p>Under Discussion</p>
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the basis for a reasonable level of evaluation appropriate to the impact. We need to understand the archaeological potential in areas of developmental impact and therefore details are provided on the type and extent of proposed site-specific groundworks, for example landscaping, grading and subsoiling

(6.2 Environmental Statement Volume 2: Figures Chapter 3: Proposed Development Description Figure 3.5 Indicative Solar PV and String Inverter Cross Section [APP-060]), drainage including ponds, detention basins, bioretention systems, swales, filter drains, filter strips, green roofs, infiltration systems and permeable paving and additional swales that will be excavated either side of access tracks totaling approximately 90,000m² **(7.16 Flood Risk Assessment Appendix A Outline Drainage Strategy [APP-0149])**.

Once this detailed design information is available, we will work with the Applicant's archaeological consultant to identify areas which will require evaluation to provide

mechanism for identifying currently unknown remains and agreeing appropriate mitigation.

No soil inversion is proposed within the Order Limits.

The areas where trenching has been undertaken were at a sample of 2%. The Written Scheme of Investigation included an allowance for a further 2% as a contingency should it be necessary to fully understand the archaeological potential in these areas. This contingency was never requested to be enacted.

Further archaeological evaluation is proposed post-DCO to inform the detailed design and mitigation to be secured through a DCO Requirement). The scope of this further work is under discussion and will be captured in an updated Outline Written Scheme of Investigation submitted at Deadline 3.

baseline evidence for fit for purpose mitigation required to deal with the scheme's impact on currently surviving archaeology, with the future mitigation and management overseen by an Archaeological Clerk of Works.

We would be looking to have evaluation completed and mitigation agreed before the commencement of the work programme in order to limit the risk of encountering unexpected archaeology and its associated impacts on the programme budget and schedule.

5-12	Relevant Representation and Subsequent Correspondence	Further Archaeological Works	<p>LCC welcome the Applicant's commitment to undertake further archaeological works post-consent. Whilst LCC welcome the proposed additional trenching, they consider best practice is that this would have been undertaken prior to submission of the DCO and to be of the full redline boundary, in accordance with NPPF, EIA Regulations and National Policy Statement EN-1.</p> <p>LCC look forward to working with the Applicant's archaeological consultant to develop an effective programme of archaeological evaluation.</p>	<p>Recently consented DCO solar farms, including Mallard Pass, Heckington Fen, West Burton, Cottam Solar and Gate Burton, within Lincolnshire have had similar DCO Requirements for additional trenching as is proposed for Springwell. This is established practice in the Secretary of State's decisions to grant consent and this approach is replicated for this Application.</p>	<p>Agreed</p>
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			<p>The trenching results will then form the baseline evidence for a reasonable and fit for purpose archaeological mitigation and management strategy to deal with the impacts of the development across the full impact zone and final archaeological management plan.</p>	
5-13	Relevant Representation and Subsequent Correspondence	Further Archaeological Works	<p>LCC is pleased to hear that no soil inversion or ponds will be undertaken as part of the ecological mitigation and enhancement.</p> <p>If proposals for these activities are recommended post-DCO as part of the detailed design, we would expect the LCC and the Archaeological Clerk of Works will be informed and appropriate archaeological evaluation to occur will need to be undertaken within those areas.</p>	Under Discussion
5-14	Email and meeting correspondence and Subsequent Correspondence	Archaeology impacts at construction	<p>LCC are pleased that the Applicant has sought to avoid PV arrays within areas of archaeological sensitivity and committed to design flexibility once the trenching programme has been completed post-DCO once the</p>	Under Discussion
			<p>The areas of ecological enhancement comprise grassland habitat as set out in the Outline Landscape and Ecology Management Plan [EN010149/APP/7.9.3] which will be less damaging to any below ground archaeological remains than the current arable land use (no soil inversion is proposed, only harrowing and seeding of the areas). The Applicant considers it disproportionate to carry out intrusive evaluation of these areas.</p> <p>Geophysical surveys (set out in ES Volume 3, Appendix 9.4: Geophysical Survey Report [EN010149/APP/6.3] [APP-100] – [APP-105]) has identified areas of archaeological potential, which has been factored into the design of the Proposed Development. The Applicant has sought to avoid siting solar PV within areas of archaeological potential.</p>	

areas of archaeological importance will have been better identified and understood.

As stated in 5-11 above, LCC recognise that the works are iterative and that the additional investigations including archaeological trenching will be completed once detailed design has been completed and areas of ground impact have been identified.

There will be additional areas of archaeological activity not identified by the geophysical survey or other non-intrusive methods currently undertaken to date. Once the areas of ground impact are known, the trenching oWSI can be amended as required.

The oWSI has been broadly agreed and a final version is anticipated during the DCO determination period, with area and task-specific WSIs being produced by the Applicant and approved by LCC in consultation with Historic England.

Within areas required for cable routing, the detailed design would seek to avoid or minimize impacts. Residual impacts would be mitigated through a programme of archaeological work to be secured through a DCO Requirement in line with the **Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]**. This would include trenching of the cable routes and other areas where excavation is proposed (such as for ITS and new access roads). This would also include excavation of the area for the Collector Compound in Field By22 to mitigate any impacts on the WWII crash sites. As detailed in the **Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]** mitigation measures for any archaeological remains identified during the additional trial trenching would be agreed with the local authority archaeological advisor and Historic England as appropriate. Other mitigation for known heritage assets is set out in the **ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1] [AS-012]** and the **oCEMP [EN010149/APP/7.7.3] [REP2-015]**.

The **Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]** sets out the process by which archaeological mitigation would be agreed. In summary, (i) further trial trenching will test the extent, state of preservation and depth of

the archaeological remains; (ii) where the remains are of a level of importance that merits preservation in situ (e.g. high importance remains equivalent to scheduled monuments) the design will make use of non-intrusive construction (e.g. concrete feet for solar panel supports and near / on surface cabling) where possible and exclusion of areas where this method is not possible; (iii) where the remains are of low or medium importance non-intrusive construction will be used where possible but where these remains cannot be preserved in situ an area of pre-construction excavation, recording and archiving of the remains in accordance with a task-specific Written Scheme of Investigation (in line with the **Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]**) would mitigate the effects.

The Proposed Development retains flexibility for detailed design post-consent within the masterplan parameters with regard to: the method for supporting solar arrays, and the location of ITS, internal cables and access tracks.

5-15	Email and meeting correspondence and Subsequent Correspondence	Archaeology impacts at Decommissioning	LCC note that archaeology would be located less than a metre below ground and therefore removal of infrastructure up to a depth of one metre could harm below ground archaeology.	The Applicant considers that any areas where decommissioning would result in impacts through removal of infrastructure up to 1m below ground level would have already been impacted during construction and these impacts would be mitigated at
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Under discussion

The Decommissioning Plan has yet to be developed and alongside the limited and insufficient proposed trenching, it is anticipated that archaeology cannot be scoped out from the decommissioning phase until such time that it has been assessed.

The iterative nature of the process and lack of detail means that the impacts cannot yet be understood or evaluated. LCC do not yet have a fully informed baseline detailing the archaeological potential and will not until we have completed the evaluation trenching. If we knew, we would not require further trenching and would have a site-specific and fit for purpose mitigation strategy.

As such, whilst some of the impacts are likely to have occurred during the construction and operational phases, additional impacts, such as the location of decommissioning compounds, have yet to be determined and thus all impacts cannot be reasonably ruled out. Consequently, we consider that archaeology should not be descoped from the oDEMP at this stage and

preconstruction or during construction through a programme of archaeological work secured by a DCO Requirement in line with the **Outline Written Scheme of Investigation [EN010149/APP/7.15] [APP-0148]** and the **Outline Decommissioning Environmental Management Plan (oDEMP) [EN010149/APP/7.13.3] [REP2-023]**, significant effects are therefore not considered likely.

The Applicant considers that there is sufficient knowledge of the baseline. **ES Volume 3, Appendix 9.1: Archaeological Desk- Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.2] [REP1-036]**, **ES Volume 3, Appendix 9.2: Geoarchaeological Deposit Modelling Report [EN010149/APP/6.3] [APP-098]**, **ES Volume 3, Appendix 9.3: Aerial Investigation Report [EN010149/APP/6.3] [APP-099]**, **ES Volume 3, Appendix 9.4: Geophysical Survey Report [EN010149/APP/6.3] [APP-100] – [APP-105]** and **ES Volume 3, Appendix 9.5: Archaeological Trial Trenching Report [EN010149/APP/6.3] [APP-106]** together have identified clear areas where archaeological remains are present as well as areas where substantial archaeological remains are unlikely. The proposed programme of post-DCO evaluation will

			that the operational and decommissioning phases would be included in the Archaeological Mitigation and Management Strategy and overseen by the appointed Archaeological Clerk of Works.	ensure that appropriate mitigation for archaeological remains is secured.	
5-16	Email and Subsequent Correspondence	Ancillary works	<p>Impacts on buried archaeology will occur from ecological enhancement which will comprise a mosaic of retained and enhanced neutral grassland meadows, arable margins, hedgerows and woodlands and BNG activities as stated in ES Other Documents Outline Landscape and Ecology Management Plan [EN010149/APP/7.9]. Other ancillary works such as flood alleviation and drainage, which can and will cause harm to buried archaeological remains and earthworks.</p> <p>Tree planting alone can be very destructive to underlying archaeological remains, the root structures of mature trees can be deep and cover areas several times the size of the tree canopy. The root structures can destroy surviving archaeological features, change soil chemistry and hydrology, there can be uprooting from storm damage</p>	<p>ES Volume 1, Chapter 9: Cultural Heritage [EN010149/APP/6.1.2] [AS-012] considers all potential impacts including the ancillary works and ecological enhancement measures. With the exception of the proposed community growing area north of Scopwick, tree planting proposed would be limited to enhancements to existing hedgerows or new hedgerow planting around the areas proposed for solar arrays. No ponds or scrapes or other areas of excavation are proposed as part of the ecological enhancement measures, and therefore, no impacts on below-ground archaeology are anticipated. The updated Outline Written Scheme of Investigation includes evaluation of the more substantial areas of planting.</p> <p>Any alterations to these proposals during the detailed design phase of work would require a variation to the DCO and the Applicant considers that DCO requirements on the detailed design would adequately allow for further assessment of any additional impacts</p>	Under discussion

and when a tree dies the roots
whither and leave voids which
collapse.

resulting from changes to the Proposed
Development.

There will be potential
archaeological impacts from the
flood mitigation measures, such as
the proposed elevation of
infrastructure which will be on level
platforms once the land within that
area has undergone cutting and
filling works for achieving the level
platform (ES Other Documents 7.16
Flood Risk Assessment
[EN010149/APP/7.16.2]) and the
attenuation of additional overland
flood paths as outlined in Appendix
A of the above mentioned document.
These areas require archaeological
evaluation to identify and assess
archaeology and develop
appropriate mitigation.

Whilst we are pleased to see
ecological ground disturbance is
limited and not anticipated to be
significant, our concerns extended
beyond just ecological works and
encompassed other construction
works such as access tracks, works
compounds, flood and drainage
mitigation and the landscaping,

grading and subsoiling of the PV array areas.

These all have the potential to impact buried archaeological remains and once details are known following detailed design, we will be able to develop a more effective and targeted programme of evaluation trenching as opposed to a blanket approach.

Table 6 - Cumulative Effects

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
6-1	Statutory Consultation / Section 42 response	Approach to assessment	LCC are in agreement that the long and short list of other existing developments should be kept under review.	The Applicant remains committed to updating the cumulative long list as new developments come into the public domain, ensuring that the assessment remains as accurate and comprehensive as possible throughout the examination process.	Agreed
6-2	Statutory Consultation / Section 42 response	Land, soils and groundwater	<p>LCC are in agreement with the Applicant's commitment to review the cumulative availability of BMV land in the region in agreement with statutory consultees.</p> <p>Suggestion that all registered solar NSIPs in Lincolnshire should be</p>	<p>The Applicant is grateful for engagement with NKDC and LCC on this matter and welcomes further engagement if required.</p> <p>An assessment of the temporary loss of BMV agricultural land from solar developments in Lincolnshire and within 1km of the Nottingham shire boundary has been undertaken, as detailed in ES Volume 1, Chapter 16:</p>	Agreed

			considered in relation to cumulative assessment on agricultural land.	Cumulative Effects [EN010149/APP/6.1.3] [REP2-012].	
6-3	Statutory Consultation / Section 42 response and Subsequent Correspondence	National Grid Navenby Substation	<p>LCC note that relevant assessments, as well as the overall cumulative assessment should take into account cumulative effects of the proposed National Grid Navenby Substation, noting the effects could be permanent. Specific topic areas raised include:</p> <ul style="list-style-type: none"> • Traffic and transport (construction) • Noise and vibration (construction and operation) • Agricultural land (construction and operation) • Landscape and visual impact (construction and operation) • Biodiversity (construction and operation) <p>GHG impacts (construction and operation) as the Proposed Development should be liable for a proportion of the emissions relative to its connection agreement.</p> <p>The potential for significant inter-projects effects to arise from this development in combination with other developments is of particular concern and as such the Council's position on cumulative impacts in</p>	<p>An assessment of the inter-project cumulative effects with other existing development and/or approved developments, which includes the proposed National Grid Navenby Substation is provided in ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.3] [REP2-012]. This assessment considers the potential combined impacts of Springwell Solar Farm alongside other nearby projects.</p> <p>This assessment details that in the scenario that the National Grid Navenby Substation was constructed at the same time as the Proposed Development, and with regard to the tract of the landscape within LCA 7 (see further detail in ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.3] [REP2-012]) and views from the A15 during construction and operation would be considered to be significant. There are also anticipated to be minor adverse inter-project cumulative effect on the landscape character of LCA 7 with the Navenby Heath battery storage project, and minor adverse inter-project cumulative effects with the RAF Digby proposed office and training building on landscape character of LCA 7, users of Navenby Lane, B1191, PRoWs and lanes between the B1191 and Green Man Lane (extending up to the A15) which is considered to be significant.</p>	<p>Under Discussion</p>

the overall balance is negative. The Council will make further comments on the potential cumulative impact of the development with other NSIP proposals as further information on the other projects comes forward.

The Applicant is committed to keeping the long and short list under review and updating the cumulative assessment throughout the examination. A revised version of **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.3] [REP2-012]** has been submitted at Deadline 1 to take account of the Leoda Solar Farm (PINS project reference EN0110016) for which the EIA Scoping Report was submitted in January 2025. At Deadline 2, a full update of the inter-project long and short lists has been submitted, with an assessment cut-off date of 30 May 2025. The same process will be repeated for Deadline 4, with an assessment cut-off date of 29 August 2025. This has been confirmed within the **Deadline 1 cover letter [REP1-001]**.

An updated cumulative assessment to account for the information detailed in the National Grid Navenby Substation EIA Scoping Report has been submitted at Deadline 3.

6-4	Statutory Consultation / Section 42 response	Short-list of developments	LCC question the exclusion of Brauncewell Quarry and Len Kirk Plant Hire Ltd from the cumulative short list as impacts of mineral developments should be considered given potential cumulative impacts from traffic, noise, dust as well as visual impacts.	The two applications listed, Brauncewell (PL/0082/22) and Len Kirk Plant Hire Ltd (PL/0028/22) were included in the long list. However given the size and scale of the development proposed (installation of filter press and wash plant respectively) these did not meet the Stage 2 criteria for inclusion in the Cumulative Effects Assessment (CEA) (see ES Volume 3, Appendix 16.1: Long List of	Agreed
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Other Developments [EN010149/APP/6.3.3] [REP2-012]).

The potential cumulative effects of mineral developments have been considered. A review of LCC's Lincolnshire Minerals and Waste Local Plan: Preferred Approach for Updating the Plan – Regulation 18 Consultation, Site Assessment Report (June 2024), was conducted to identify sites within the CEA's 10km Zone of Influence. Sites with a planning application or submitted EIA Scoping Report have been included in the short list for the CEA, such as the extension at Dunston Quarry (PL/0094/23) (see Table 16.3 Short list of other approved and or existing developments within **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.3] [REP2-009]**).

Table 7 – Design

Ref.	Source	Description of Matter	Stakeholder Comments	Applicant's Response	Status
7-1	Email and Meeting Correspondence	Approach to good design	LCC agreed with the Applicant's approach to good design and were consulted on this matter throughout the engagement process. This includes the application of design principles to guide decision making and embed good design outcomes to the Proposed Development	<p>The Design Approach Document [EN010149/APP/7.3.2] [REP1-056] sets out the Applicant's approach to good design.</p> <p>It demonstrates how the Proposed Development would fulfil the requirement for good design and demonstrate adherence to the mitigation hierarchy (to avoid, reduce, mitigate, compensate) set out and required within the</p>	Agreed

which will be secured via Control Documents within the draft DCO.

Overarching National Policy Statement (NPS) for Energy (EN-1) (2023) and the NPS for Renewable Energy Infrastructure (EN-3).

It explains how good design has been embedded into the Proposed Development from the outset of the design process via a clear design framework and the application of design principles. This has provided a shared understanding of desired outcomes for the Proposed Development and informed decision making.

It explains the way in which the design has evolved since inception, the rationale for the proposals contained within the DCO Application, and the mechanism by which good design would be secured post-consent.

The approach to good design was discussed with LCC at key meeting throughout the engagement process (as outlined in Table 1: Record of Engagement). This included an overview of the design approach and the use of design principles (01/06/23), presentation of the Project Principles (14/09/23) and presentation of the securing mechanisms (12/09/24).

7-2	Email and Meeting Correspondence	Enhancements	LCC supports the development of Green Infrastructure /proposals for recreation and amenity improvements, which should be maximised and integrated within the Proposed Development.	The Applicant is committed to continuing to engage proactively with stakeholders in the design of Green Infrastructure and amenity and recreation improvements that the Proposed Development could deliver.	Agreed
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	<p>Following Phase Two Consultation, the Applicant continued to engage with stakeholders, including the host authorities, on the design of the Proposed Development.</p> <p>This included dedicated meetings with LCC Highways and Public Right of Way Officers on potential amenity and recreational improvements in April 2024. The Applicant also met with NKDC and its appointed ecologist on 23 July 2024 to discuss the development of the green infrastructure and biodiversity strategy proposals.</p> <p>Details of the proposed enhancements to the green infrastructure network are presented in the Design Approach Document [EN010149/APP/7.3.2] [REP1-056] and include the provision of 3.49km of new PRoW, 8.58km of permissive paths, improvements to the Spires and Steeples Trail and a new community growing area.</p>	
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Table 8 – Public Health and Wellbeing

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
8-1	Statutory Consultation / Section 42 response	Public Rights of Way	LCC note that the health impacts of any diversions to both PRoW and cycle route during all phases should be considered, including diversions due to the connection of the Proposed Development to the National Grid.	<p>An assessment of pedestrian amenity is presented in ES Volume 1, Chapter 14: Traffic and Transport [EN010149/APP/6.1.2] [AS-010]. An assessment of the effect of temporary closures and available alternative routes in Springwell East on walkers, cyclists and horse riders is also included within ES Volume 1, Chapter 13: Population [EN010149/APP/6.1.2] [REP1-016]. This covers all relevant PRoWs, including cycle routes.</p> <p>The Applicant has produced a Health and Wellbeing Summary Statement [EN010149/APP/8.10] [REP1-067], submitted at Deadline 1. Chapter 4 of the Health Summary Statement provides a summary of all of the significant (moderate and above) and minor significance in-combination and cumulative effects reported within the ES, and describes them in terms of their relevance to health in-line with guidance – this includes a consideration of the in-combination effects on PRoW users.</p> <p>The Applicant has produced an Outline Public Rights of Way and Permissive Paths Management Plan (oPROWPPMP) [EN010149/APP/7.12.2] [REP1-044] which</p>	Agreed

sets out how the Applicant is proposing to manage PRow and permissive pathways to ensure they are safe and accessible throughout the lifetime of the Proposed Development.

There are no proposals to permanently stop up any existing PRow as part of the Proposed Development. However, during the construction phase there may be a requirement to temporarily close PRow for a duration of up to six months. This potential requirement applies to all PRows that interact with the Proposed Development including those within the area covering the connection to the National Grid.

Any diversion requirements would be outlined at detailed design, in line with the potential alternative routes identified within the **oPROWPPMP [EN010149/APP/7.12.2] [REP1-044]**. The Applicant has engaged with LCC Highways and PRow officers on requirements for PRow crossings and temporary closures during construction and potential diversion options in Springwell East.

In addition, the Applicant has developed the design of the Proposed Development to create an enhanced and better-connected footpath and cycle network. This includes approximately 3.49km of additional PRow

				<p>and approximately 8.58km of additional permissive paths, as shown on the ES Volume 2, Figure 3.3: Green Infrastructure Plan [EN010149/APP/6.2.2] [REP1-026] and secured in the Streets, Rights of Way and Access Plans [EN010149/APP/2.4.2] [REP1-044]. The Proposed Development would also include a permanent upgrade to the existing PRow between Scopwick and Blankney (Spires and Steeples Trail) to bridleway status (approx. length 2,090m). This would include an upgrade of the existing surface conditions of the PRow to better allow user access and enjoyment to ‘all-weather’ standard allowing year-round accessibility for non-motorised users. The surface enhancements would be secured via the Design Commitments [EN010149/APP/7.4] [APP-0138].</p>	
8-2	Relevant Representation and Subsequent Correspondence	Human Health	<p>LCC remain disappointed that human health has been scoped out of the ES as a separate chapter and that the Applicant has not undertaken a health impact assessment. The information contained in the ES chapters that are relevant to population health do not provide sufficient assurance that the mental health impacts of a solar farm development on such a</p>	<p>At an early stage, the Project advised of its intention to consider effects on human health through individual topic chapters within the EIA.</p> <p>ES Volume 3, Appendix 5.2: Scoping Opinion [EN010149/APP/6.3] [APP-076], as well as LCC and NKDC confirmed that this approach was acceptable on the basis that the ES should clearly set out potential impacts on human health from the Proposed Development during construction, operation and decommissioning and cross-references</p>	<p>Under Discussion</p>

significant scale have been adequately addressed.

LCC welcome the applicant's commitment to produce a consolidation document for Health and Wellbeing, which we will review and provide comments on once available.

are made to where impacts are considered and assessed within other relevant topic chapters of **ES Volume 1** [EN010149/APP/6.1][APP-040 – APP-057].

ES Volume 3, Appendix 5.3: Scoping Opinion Response Matrix

[EN010149/APP/6.3] [APP-077] set out that consideration of impacts upon human health as a result of the Proposed Development are covered through the findings of other assessments undertaken as part of the EIA, such as air quality, landscape and visual, noise and vibration and traffic and transport

Reference to environmental impacts on health and wellbeing is provided in Table 5.2 of **ES Volume 1, Chapter 5: Approach to the EIA** [EN010149/APP/6.1] [APP-045], and from paragraph 8.1.38 to 8.1.47 in the **Planning Statement** [EN010149/APP/7.2.2] [AS-018].

Notwithstanding this, the Applicant recognises that LCC is disappointed that physical and mental health and wellbeing has not been considered in a stand-alone statement. The Applicant also recognises that there is a substantial number of other Relevant Representations from members of the public, Parish Councils and local opposition groups that cite concern about physical and mental health and wellbeing,

	<p>related to a wider range of factors. The Applicant is content that receptors and health pathways, and individual environmental effects related to health and wellbeing have been appropriately considered, assessed and mitigated for (where practicable) as per the approach agreed at EIA Scoping. However, given the number of representations (noting that mental health can be affected by the clear provision and articulation of information), the position of key stakeholders and the fact that the approach to consideration of health and wellbeing is split across a number of different ES chapters, Management Plans and Other Documents (such as the Equality Impact Assessment [EN010149/APP/7.18] [APP-0151]), the Applicant considers that it would be beneficial to provide a comprehensive document that consolidates these elements in one place to demonstrate the consideration of health pathways. The Health Summary Statement [EN010149/APP/8.10] [REP1-067] has been submitted at Deadline 1 following engagement with LCC.</p>	
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Table 9 – Landscape and Visual Impact

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
9-1	Statutory Consultation / Section 42 response	Approach to assessment	LCC requested that the location and 'worst case' extent of these elements are explicitly identified through works plans and/or parameter plans to allow for a better understanding of the potential landscape and visual effects, and ZTV figures produced on the worst-case parameters.	Following statutory consultation, the proposed locations of the BESS and Springwell Substation were each narrowed down to a single location. Greater clarity has been provided in relation to the reasonable 'worst-case scenarios' assessed for landscape and visual effects in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1] [APP-050] . The parameters assessed (which represent the maximum parameters of development and therefore a 'worst-case scenario') are described in ES Volume 1, Chapter 3: Proposed Development [EN010149/APP/6.1] [REP1-022] . Of particular relevance is also ES Volume 2: Figure 3.2 Height Parameters [EN010149/APP/6.2][APP-060] . The ZTVs presented in ES Volume 2, Chapter 10: Landscape and Visual [EN010149/APP/6.2][APP-050] are also based on the maximum parameters identified for each component of the Proposed Development and, therefore, represent worst-case scenarios for each component.	Agreed
9-2	Statutory Consultation / Section 42 response	Approach to assessment	LCC noted that the list of receptors proposed to be scoped out of the LVIA were reasonable and justified and commented that this information	This has been noted. Receptors scoped out of the LVIA and appropriate justification is presented for information in Table 10.3 of ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1][APP-050] .	Agreed

			should be presented in the LVIA to aid understanding.	Specifically, the following receptors were scoped out of the LVIA and it is agreed that there would be no significant landscape or visual effects on any of the following receptors: <ul style="list-style-type: none"> Lincolnshire Wolds National Landscape (formerly AONB); Lincoln Cliff Area of Great Landscape Value (AGLV); All Landscape character areas (LCAs) in the North Kesteven Landscape Character Assessment with the exception of LCA 7: Limestone Heath and LCA 11: Central Clays and Gravels; Views from Metherringham, Bloxham, Digby, Dorrington, Ruskington, Leasingham, Cranwell, RAF Cranwell, Wellingore and Navenby and other settlements along the A607; PRoW and local roads beyond 3km from the Site; and Users of the rail network, specifically section between Metherringham and the level crossing on the B1191. 	
9-3	Statutory Consultation / Section 42 response	Approach to assessment	LCC are in agreement that the baseline should include both Landscape fabric/ elements; and Landscape key characteristics and that this information should be clearly presented in the LVIA.	This has been noted. A full baseline is presented in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1][APP-050] and ES Volume 3, Appendix 10.2: Baseline Landscape Character Appraisal [EN010149/APP/6.3][APP-108].	Agreed

9-4	Statutory Consultation / Section 42 response	Approach to assessment	LCC confirmed that it was in agreement with the approach to assessing significance outlined, including the use of professional judgement for 'Moderate' effects. Request that where Moderate effects are deemed not significant, a brief narrative should be provided for transparency.	This has been noted. The full methodology for the LVIA is presented in ES Volume 3, Appendix 10.1: Landscape and Visual Methodology and Assessment Criteria [EN010149/APP/6.3][APP-107] . Within ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1][APP-050] , justification has been provided where moderate effects are not deemed to be significant. It is agreed that the assessment approach, methodology and assessment criteria adopted for the LVIA is appropriate and in accordance with published guidelines as outlined in the above chapter of the ES.	Agreed
9-5	Statutory Consultation / Section 42 response	Landscape viewpoints	Through ongoing consultation, LCC made various suggestions, comments and requests in relation to the viewpoints to be presented in the LVIA.	<p>The Applicant has engaged and consulted with LCC from the outset on the selection of viewpoints to be adopted for the LVIA as recorded in Table 1 of this SOCG.</p> <p>AAH Technical Memorandum 05 (AAH TM05) dated 10 July 2024 provided confirmation that LCC considered the final selection of viewpoints and photomontages to be acceptable.</p> <p>It is therefore agreed that the viewpoints and photomontages presented in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1][APP-050] and ES Volume 4, Landscape Visualisations [[EN010149/APP/6.4][APP-0127 to APP-133]] are appropriate to enable a robust</p>	Agreed

				assessment of the landscape and visual impacts of the Proposed Development.	
9-6	Statutory Consultation / Section 42 response	Methodology	At statutory consultation, LCC noted that the information collated as part of The Historic Character of The County of Lincolnshire (2011) should be utilised to ensure the Proposed Development is sensitive to the historic landscape.	The <i>Historic Character of The County of Lincolnshire (2011)</i> has been reviewed and is referenced in ES Volume 3, Appendix 10.2: Baseline Landscape Character Appraisal [EN010149/APP/6.3][APP-108] as appropriate.	Agreed
9-7	Statutory Consultation / Section 42 response	National Character Areas	At statutory consultation, LCC commented on National Character Areas, including acknowledgement that NCAs are not expected to be a receptor as they are at a large scale and typically provide context only, but where possible the Proposed Development should avoid impact to and where possible enhance local distinctiveness.	<p>This has been noted. National Character Areas are referenced as appropriate in ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1][APP-050].</p> <p>The design of the Proposed Development has been developed to respond to the distinctive and unique local character of the Site, as informed by relevant studies, including National Character Area profiles. This is set out in the Design Approach Document [EN010149/APP/7.3.2][APP-137] and is one of the Project Principles (Principle 2.2) which has been used to guide the design</p>	Agreed
9-8	Relevant Representation	Mitigation Planting	LCC notes that paragraph 16.6.41 of Chapter 16, of the ES, states that “No further additional mitigation has been proposed to mitigate inter-project cumulative effects between the two developments.”	The Applicant has noted the suggestion of additional hedgerow planting within the Springwell Order Limits to mitigate the cumulative landscape and visual effects with the proposed National Grid Navenby Substation.	Under Discussion

			<p>However, there are potential opportunities for the applicants of each scheme to coordinate mitigation planting in the area around the National Grid Substation, which we would recommend are investigated further if possible. For example, this may include the extending of carriageway hedgerow planting further north along the western edge of the A15 (such as along field parcels Bcd024, Bcd027, Bcd031), which are in the Springwell Order Limits and would bring mitigation planting closer to potential visual receptors, likely further screening the proposed National Grid Substation.</p>	<p>As of April 2025, National Grid has not yet submitted an application for the proposed Navenby Substation and therefore details of the expected application are not available.</p> <p>The Applicant will continue dialogue with National Grid and once details of the proposed Navenby Substation are available will review any opportunities to provide additional mitigation of any cumulative landscape and visual effects.</p>	
9-9	Relevant Representation	Landscape and Ecological Improvements	<p>The Springwell scheme would evidently deliver landscape and ecological improvements through mitigation areas and planting. However, this will be dependent upon the information set out in the Outline Landscape and Ecology Management Plan and Green Infrastructure Parameters plans which illustrate the mitigation, which should be further explored, and</p>	<p>In terms of the green infrastructure parameters, the assessment of landscape and visual effects assumes that the strategic planting shown on ES Volume 2, Figure 3.3: Green Infrastructure Parameters [EN010149/APP/6.2][APP-060] is primary and embedded landscape mitigation and secured within the Outline Landscape and Ecology Management Plan (oLEMP) [EN010149/APP/7.9][REP1-064].</p> <p>As per Requirement 8 of the Draft DCO [EN010149/APP/3.1] [REP1-006], no part of</p>	<p>Agreed</p>

assume would be refined at the detailed design stages.

the authorised development may commence until a written landscape and ecology management plan has been submitted to and approved by the relevant planning authority for that part, in consultation with Lincolnshire County Council, the Environment Agency and Natural England. This would cover the establishment and long-term management of all new structural planting as well as other habitats.

9-10	Relevant Representation	Draft DCO	The DCO should include for approval of any subsequent detailed landscape and ecological mitigation scheme (planting works), as referenced in Schedule 2, Requirement 5. This should clearly link to any landscape mitigation scheme that is submitted as part of the DCO, and subsequently that which has been assessed as part of the LVIA.	Landscape and ecological mitigation is secured within the Outline Landscape and Ecology Management Plan (oLEMP) [EN010149/APP/7.9.2] [REP1-064] and the detailed design will accord with the mitigation secured within this document, as referenced in Schedule 2, Requirement 5 of the Draft DCO [EN010159/APP/3.1.2] [REP1-006].	Agreed
9-11	Relevant Representation	Draft DCO	The DCO should also include for an appropriate period of landscape maintenance, currently referenced at article 32(11), that ties into a period of time identified in the Outline Landscape and Ecology Management Plan, and would expect an initial 10 to 15 year period of management and	The Outline Landscape and Ecology Management Plan [EN10149/APP/7.9.2] [REP1-064] provides a framework for delivering the Green Infrastructure elements of the Proposed Development for the construction and operational phases. It includes management and monitoring prescriptions to ensure the successful establishment of new planting.	

maintenance as a minimum, which would align with the assessed residual landscape and visual effects, and then this would subsequently be regularly reviewed and monitored at a reasonable period, such as every 3 to 5 years and implemented for the lifetime of the project.

Should the DCO be granted consent, detailed LEMP(s) will be produced for the Proposed development in accordance with **Schedule 2** of the **Draft DCO [EN010149/APP/3.1.2]** **[REP1-006]** and must be substantially in accordance with the oLEMP.

Section 7 of the oLEMP provides information on the monitoring and states that all habitats being created and enhanced for the delivery of biodiversity net gain will be monitored in years 1, 2, 3 and 5, 10 and 15 (and beyond) against the BNG Metric target and habitat types and condition.

There will be a full review and update of the detailed LEMP(s) every 5 years by a suitably qualified ecologist and landscape architect.

Where the delivery of the detailed LEMP(s) is not being met for whatever reason(s) appropriate action will be identified and taken to rectify failings. This may entail making changes to specification of planting species if these are failing to establish successfully, including additional planting and/or replacement planting for planting that has failed to establish. Equally, where successes are identified, these would be promoted further and lessons learned from both success and failure fed into the next iteration of the detailed LEMP(s).

9-12	Relevant Representation	Vegetation removal processes	Proposed vegetation removal is identified within the draft DCO (Part 6: articles 40 & 41, and Schedule 12), Arboricultural Impact Assessment (AIA) and Vegetation Removal Parameters plans. Clear vegetation removal processes should be put in place to ensure any vegetation loss is aligned with these plans and schedules and further removal or works is agreed with the relevant parties prior to any works being carried out. This should clearly relate to hedgerow removal plans and AIA, and this must also include vegetation removal or works to facilitate wider highways and access works, such as for abnormal loads.	The vegetation removal parameters are outlined and secured within the Outline Landscape and Ecology Management Plan [EN010149/APP/7.9.2] [REP1-060] . The vegetation removal will be undertaken in accordance with the Landscape and Ecology Management Plan.	Agreed
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Table 10 – Best and Most Versatile (BMV) agricultural land and soils

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
10-1	Statutory Consultation / Section 42 response	Approach to assessment	LCC are in disagreement that the impact magnitude should be based on permanent loss of one or more soil functions or soil volumes as this does not account for loss of agricultural/ food production over the lifetime of the Proposed Development. LCC recommend that assessment of loss should include both permanent and temporary losses in line with the CLLP.	<p>The Applicant has considered the impacts to soil and BMV in line with industry guidelines (Institute of Environmental Management & Assessment (IEMA) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment (2022)) and has presented justification for the methodology in the Scoping Report and within ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2] [REP1-014]. Policy S14 of the Central Lincolnshire Local Plan has been considered, and careful positioning of elements of the Proposed Development has been a part of the design process to minimise impacts on higher quality (BMV) agricultural land.</p> <p>ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2] [REP1-014] covers both temporary and permanent land use (Section 11.9.16), and it should be noted that the only land that could be undergoing a permanent land use change has been assumed as a worst case that would be the land used for permanent green infrastructure, however in some cases, land may be returned to</p>	Under Discussion

agricultural use. The land take that has been assumed for the assessment as permanent affects a total area of 166.2ha, of which 77ha are classified as BMV land.

The Proposed Development includes proposed green infrastructure on 77 ha of BMV land. This has been assessed in the ES as presenting a permanent significant adverse effect on the basis that more than 20 hectares of land would be impacted. The impacts on soil quality and agricultural land will also be minimised during the operational phase through implementation of measures in the **oSMP [EN010149/APP/7.11.2]** [\[REP1-042\]](#).

Land that will be returned back to agricultural use following decommissioning will be returned to the prior ALC grade following measures and mitigation outlined in the **oSMP [EN010149/APP/7.11.2]** [\[REP1-042\]](#). Therefore, as the land is being returned back to the pre-construction condition in line with EN-1 paragraphs 2.10.66 and 2.10.77 the development will be classed as temporary for all areas except green infrastructure. During the operation phase soil quality is able to be improved from nutrient inputs as a result of grazing

and reduced agricultural pressure through heavy machinery, ploughing, fertilisers, herbicides and pesticides. During decommissioning the impact on soils has been mitigated through industry standard practice such as using track matting, avoiding wet weather conditions and using pile screws, these measures can be found in detail in the **oSMP [EN010149/APP/7.11.2] [REP1-042]**. Additionally, while a 40-year solar farm may seem like a long-term land use from a human perspective, it represents only a brief moment in the lifespan of soils, which develop and change over geological timescales spanning hundreds of thousands to millions of years. Therefore, its impact on soil processes is relatively short term in the context of soil evolution. Solar farming being classed as temporary land was agreed by the Examining Authority on the Heckington Fen Solar Farm Decision Letter [EN010123-001129]; *“ExA considers the Proposed Development would result in long term but not irreversible or permanent loss of agricultural land”*.

The **Draft DCO [EN010149/APP/3.1.2] [REP1-006]** includes a requirement that each phase of the Proposed Development must be decommissioned after 40 years of operation, after which

time all hard infrastructure above ground would be removed from the land (as secured within the **oDEMP** [EN010149/APP/7.13.3] [REP2-021]).

As set out in the **oSMP** [EN010149/APP/7.11.2] [REP1-042] and secured by Requirement 18 of the **Draft DCO** [EN010149/APP/3.1.2] [REP1-006] during construction, operation and decommissioning measures will be put in place to ensure the soil is being handled correctly and is able to be returned back to agricultural use and the original agricultural grade following the decommissioning phase of the Proposed Development, therefore limited permanent impacts are anticipated.

10-2	Statutory Consultation / Section 42 response	Construction	<p>LCC note that there is potential for damage and deterioration of high-quality soils through construction activities, including through vehicle movements. Comments that it is possible that this could cause long-term drainage issues on site.</p> <p>Adherence to the Soil Management Plan (SMP) during all phases of the development will</p>	<p>The potential for damage to soils as a result of construction activities and vehicle movements is included in the assessment undertaken in ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2] [REP1-014]. There are significant numbers of measures that are defined in the Outline Construction Environmental Management Plan [EN010149/APP/7.7.3] [REP2-015] and Outline Soil Management Plan [EN010149/APP/7.11.2] [REP1-042]</p>	Under Discussion

			<p>help to ensure that the soil quality and structure is protected. LCC has not raised any concerns in respect of the outline SMP.</p>	<p>which will ensure that soil quality and soil structure are protected during all phases of the Proposed Development. These include stripping of topsoil where appropriate, with storage in managed stockpiles for the required timescale, followed by managed reinstatement to preserve soil alongside advise and supervision by a suitably trained person. The potential for damage to existing drainage regimes is also considered in ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1.2] [REP1-014], and the measures required to be followed by the management plans referenced above will also prevent damage to existing field drainage and prevent compaction of soils (minimising potential subsequent impacts on land drainage).</p>	
10-3	Statutory Consultation / Section 42 response	Decommissioning	<p>LCC note that consideration should be given to removing underground cabling upon decommissioning so that the land can be cultivated.</p>	<p>During the decommissioning phase, all concrete, hardstanding areas, foundations for the infrastructure and any internal tracks will be removed to a depth of up to 1m. It is assumed that all the below ground cables below 1m will be left in situ to avoid disturbance to the soil. This approach reflects common practice for Electricity Distribution Network Operators infrastructure (such as substations) and the associated export cables.</p>	Under Discussion

The approach to decommissioning would be reviewed prior to this phase of work and will be undertaken in line with industry guidance, any relevant legislation and government policy at the time of undertaking these works as set out and secured within the **Outline Decommissioning Environmental Management Plan**

[EN010149/APP/7.13.2] [REP2-021] that has been updated at Deadline 2. The approach proposed is consistent with most, if not all, made Orders for NSIP-scale solar schemes to date.

This approach reduces unnecessary handling of soil, which can impact soil quality due to compaction (details are provided in the **Outline Decommissioning Environmental Management Plan**

[EN010149/APP/7.13.2] [REP2-021] and **Outline Soil Management Plan [EN010149/APP/7.11.2] [REP1-042]**). Also, impacting the soil negatively affects mycorrhizal fungi, a key component of soil health. Leaving infrastructure in place below 1 m depth will not limit farm operations, as this is well below the typical maximum cultivation depth of 450 mm (subsoiling).

10-4	Email Correspondence	Minerals safeguarding	LCC note that areas of the site are located within a Minerals	The Applicant has undertaken a Mineral Safeguarding Assessment. Appendix 2:	Under Discussion
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			<p>Safeguarding Area for limestone. Consideration should be given to the proximity of Brauncewell and Longwood Quarries and the potential for the Proposed Development to prejudice or detrimentally impact upon the operation of the safeguarded sites which should be given more meaningful consideration.</p>	<p>Mineral Safeguarding Assessment forms part of the Planning Statement [EN010149/APP/7.2.2] [AS-018] submitted in support of the DCO.</p> <p>Given the temporary nature of the Proposed Development, the minerals within the Order Limits will not be permanently sterilised, and the land could be worked for minerals post-decommissioning.</p>	
10-5	ExQ1	Soil management	<p>The oCEMP, oOEMP, oDEMP and Outline Soil Management Plan (oSMP) contain a range of measures to manage and mitigate potential effects on soil. LCC are broadly in agreement with these documents in respect of soil management and mitigation, subject to the final documents being subject to approval through a respective requirement in the DCO.</p>	<p>The Applicant thanks North Kesteven District Council and Lincolnshire County Council for the engagement undertaken to date and appreciates that they have provided a suggested structure and matters of inclusion in the Outline Soil Management Plan [EN010149/APP/7.11.2] [REP1-042]. The Applicant has considered and prepared the Outline Soil Management Plan [EN010149/APP/7.11.2] [REP1-042] in accordance with the suggested information requirements and structure, noting that there are some instances where the structure differs slightly from the suggested approach or information has been included as a sub-heading of the works i.e. cabling works, to ensure a consistent approach has been taken throughout the document.</p>	<p>Agreed</p>

10-6	Relevant Representation	BMV Agricultural Land	<p>The potential impacts on Best and Most Versatile (BMV) agricultural land in respect of this scheme and cumulatively with other projects that are emerging/known about in Lincolnshire are of concern to the Council. LCC will seek to protect high quality agricultural land in Lincolnshire (Grades 1, 2 and 3a) from development in accordance with its Energy Infrastructure Position Statement adopted 5 December 2023.</p> <p>https://lincolnshire.moderngov.co.uk/documents/s60096/Energy%20Infrastructure%20Position.pdf</p>	<p>Policy S14 of the Central Lincolnshire Local Plan has been considered, and careful positioning of elements of the Proposed Development has been a part of the design process to minimise impacts on higher quality (BMV) agricultural land.</p> <p>Section 16.8 of ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.3] [REP2-008] provides an inter-project cumulative effects assessment of BMV agricultural land. The approach to the assessment of the inter-project cumulative effects of the temporary loss of use of BMV agricultural land has been informed by the approaches by other solar DCOs that have been through Examination in the Lincolnshire area (e.g. Mallard Pass Solar Project, Cottam Solar Project etc).</p>	Under discussion
10-7	Relevant Representation	BMV Agricultural Land	<p>The overall Agricultural Land Classification (ALC) findings for the Springwell proposal are set out in the ES Chapter 11: Land, Soil and Groundwater (Table 11.13 Appendix 3) [APP-112 – 114]. Approximately 42% of the site is assessed as BMV. Whilst the loss of BMV land used for solar panels is considered ‘temporary’, 40 years is however a long period. The amount of</p>	<p>As set out in ES Volume 1, Chapter 11: Land, Soil and Groundwater [EN010149/APP/6.1] [REP1-014], the permanent land take for green infrastructure assumed for the purposes of the assessment, affects a total area of 166.2ha, of which 77ha are classified as BMV land. This land would not be occupied by permanent hardstanding, buildings or other infrastructure associated with the Proposed Development, but would comprise</p>	Under discussion

			BMV land to be lost 'permanently' (mainly due to green infrastructure) is significant, amounting to around 77 hectares of BMV.	landscaped areas that are to be incorporated into the Proposed Development in order to provide beneficial attributes in terms of biodiversity mitigation and enhancement. Therefore, although this area of permanent landscaping does result in the lack of availability of a small proportion of agricultural land (and a smaller area of BMV land), this is considered to be offset by the positive impacts associated with the provision of biodiversity mitigation and enhancement areas.	
10-8	ExQ1 Response	ALC Reports	The results in the ALC reports have been undertaken by a professional team in agreement with Natural England and the results are considered reliable.	<p>Agricultural land classification surveys were carried out between March 2022 and October 2024, covering the land within the Order Limits. The surveys used a combination of records published online, and intrusive investigatory works in order to grade the agricultural land.</p> <p>The results of the surveys are split into three reports comprising Springwell West (including the Grid Connection Corridor), Springwell East and Springwell Central which are presented in ES Volume 3, Appendix 11.1A: Springwell West Agricultural Land Classification [EN010149/APP/6.3] [APP-112], Appendix 11.1B: Springwell East Agricultural Land Classification [EN010149/APP/6.3] [APP-113] and Appendix 11.1C: Springwell Central</p>	Agreed

Agricultural Land Classification
[EN010149/APP/6.3] [[APP-114](#)].

Table 11 – Population

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
11-1	Relevant Representation and Subsequent Correspondence	Employment	The SoCG doesn't seem to refer to independent training providers/charitable organisations as previously mentioned. LCC believe there is a gap in the Outline Employment, Skills and Supply Chain Plan, with regards to independent training providers/charitable organisations that deliver adult learning programmes. LCC host two Regional Adult Skills Groups (one for Lincoln / West Lindsey / South and North Kesteven regions, and one for Boston / South Holland / East Lindsey regions) where Providers come together on a bi-annual basis. It would be worthwhile considering these in the Outline Employment, Skills and Supply Chain Plan.	The Applicant has engaged with a learning and skills representative from LCC. Following this, the recruitment and training opportunities that could be available to communities through the Proposed Development have been conveyed to the recent meetings of the Regional Adult Skills Groups. This would be followed by regular updates in the run up to, and during, construction; enabling close relationships to be built between the Applicant, contractors and skills providers. LCC has identified providers represented on the Regional Groups that deliver skills that best match the requirements of the Proposed Development and introductory conversations between the Applicant and those providers have taken place.	Under Discussion

11-2	LCC Local Impact Report	Employment and skills	<p>There is a need for the Secretary of State to require the approval of an employment and skills plan.</p>	<p>An Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20] [APP-0153] supports the DCO Application. The overarching aim of the Plan is to help maximise positive gain for the local economy from the beneficial effects arising from employment generation and supply chain opportunities during the construction and operational phases.</p> <p>The Outline Plan details commitments to work with partners and the local and regional construction supply chain to open up opportunities for jobs and skills development for communities and for companies with relevant experience and competencies to engage with the supply chain. The objectives of the Outline Employment, Skills and Supply Chain Plan [EN010149/APP/7.20] [APP-0153] are detailed below:</p> <ul style="list-style-type: none"> • Promote opportunities for people who are employed, unemployed and economically active and young people who are Not in Education, Employment or Training (NEET) to access employment and skills development opportunities; • Create opportunities for businesses to tender for work and join the supply chain of the Proposed Development; • Clearly define the workforce, skills and supply chain requirements of the 	Agreed
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Proposed Development and articulate these in a clear and timely way to regional stakeholders involved in supporting education, access to employment, skills development and business engagement;

- Harness the motivational potential of the Proposed Development to inspire the next generation of talent, particularly, to confidently invest in a career and future in Lincolnshire, benefitting all employers;
- Contribute to a Regional evidence base to support the planning and delivery of education and skills curricula and training capable of delivering the workforce and skills needed across the Region, at the right time, to support the business competitiveness of all energy and construction projects.

Mechanisms for how these objectives can be achieved are being considered, but may be delivered through the applicant, main construction organisation or a third-party organisation. Delivery will be supported by an Education and Skills Fund. £50,000 will be payable on an annual basis, up to a sum not exceeding £2,000,000. The first instalment will be payable on commencement of the main construction contract (s). Further

instalments of £50,000 will be made on the anniversary of commencement.

The Outline Plan sets out a framework whereby people may be able to up/re-skill, if required, to contribute to the workforce required by the Proposed Development as well as support their own career development generally. Actions proposed would also contribute to strategic policy objectives to improve the skills base and supply chain in green construction. This will aid in addressing future cumulative demand for similar skills across the Region's renewable energy sector and, potentially, increase local and regional supply chain capacity.

The Applicant has engaged with LCC on the Outline Plan content and approach and will continue to engage on continued development and refinement. The development of the Final Employment, Skills and Supply Chain Plan would be steered by a stakeholder working group. LCC has welcomed the proposal within the Outline Plan that NKDC and LCC will be at the core of the working group.

The Applicant and NKDC have had ongoing engagement on the potential for an agreement, subject to the Applicant being satisfied that such a package would meet the tests of s106. The Applicant had a meeting

with LCC and NKDC to discuss s106. The Applicant offered to the council to prepare the first draft of a s106 Agreement.

Table 12 – Public Rights of Way and permissive footpaths

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
12-1	Statutory Consultation / Section 42 response and Subsequent Correspondence	New footpaths	LCC have been in discussions with the applicant regarding the provision of new PRow and permissive paths and the inclusion of these new routes in the DCO application are welcomed.	<p>The Grid Connection Corridor is required to connect the Springwell Substation and the proposed National Grid Navenby Substation. It would primarily consist of an underground cable route located within the spatial extents secured by the Works Plans [EN010149/APP/2.3] [APP-007].</p> <p>Following Phase Two Consultation, the western section of the Grid Connection Corridor was discounted and removed from the Order Limits to increase the distance from Gorse Hill Covert and reduce potential impacts on high priority hedgerows and trees. The Grid Connection Corridor is proposed at the eastern edge of existing field boundaries, adjacent to the A15 to reduce impact on farming activities and enable the land to remain available for agricultural use. The corridor is not included for biodiversity mitigation for this reason.</p>	Agreed

				<p>New PRow and permissive paths proposed as part of the Proposed Development have been developed in liaison with the Local Highway Authority and PRow officers to improve connectivity where desire lines are likely to exist. This includes approximately 3.49km of additional PRow and approximately 8.58km of additional permissive paths. The new routes are located across the Order Limits and includes provision of a new off-road link between RAF Digby and Scopwick.</p>	
12-2	Statutory Consultation / Section 42 response	New footpaths	<p>LCC note that improvements to recreation and amenity are welcomed, including provision of new permissive footpaths and rights of way.</p> <p>LCC note that further benefits could be delivered as part of the Proposed Development and the host authorities would welcome further engagement on this matter.</p>	<p>The Applicant proposes to provide a new PRow between RAF Digby and Scopwick behind the existing hedgerow, connecting to the existing footpath at Scopwick and 30mph zone with a speed limit reduction extension included within the DCO. The proposed PRow would mostly be off the carriageway, behind the hedgerow connecting at both ends. The proposed PRow is shown on the Streets, Rights of Way and Access Plans [EN010149/APP/2.4.2] [AS-005].</p>	Agreed
12-3	Statutory Consultation / Section 42 response	Spires and Steeples Way	<p>LCC note that the Applicant should demonstrate that disruption to the Spires and Steeples Trail is kept to a minimum as it provides important health and wellbeing</p>	<p>The design of the Proposed Development has been guided by the Project Principles set out within the Design Approach Document [EN010149/APP/7.3.2] [REP1-056]. This includes developing the design to protect the amenity of the Spires and Steeples Trail, avoiding any Solar</p>	Agreed

			benefits and linkage between villages.	<p>PV development between the route and the B1188 (Principle 5.2).</p> <p>Specific regard has been made to the Spires and Steeples Trail during construction to maintain its use and facilitate safe construction via crossing points, including the provision of a bank person.</p> <p>Engagement with LCC Highways and PRow officers has been undertaken throughout the pre-application period, including on the Spires and Steeples Trail. An Outline Public Rights of Way and Permissive Paths Management Plan [EN010149/APP/7.12] [REP1-004] has also been developed, with management measures within the Plan agreed with the Local Planning Authorities.</p>	
12-4	Statutory Consultation / Section 42 response	Footpath	LCC note that the extension to the proposed RAF Digby – Scopwick footpath is welcomed.	<p>The Applicant considers that the introduction of a new PRow between RAF Digby and Scopwick would improve accessibility for non-motorised users in this location, providing a dedicated, safe off-road route between these two settlements that does not currently exist. Details of the proposed PRow extension are shown on the Streets, Rights of Way and Access Plans [EN010149/APP/2.4.2] [AS-005].</p>	Agreed
12-5	Relevant Representation and Subsequent Correspondence	PRow enhancement	LCC note that the PRow enhancement proposals have been the subject of consultation with the Council's Public Rights of Way Officers and the	<p>The Applicant engaged with LCC Highways and PRow Officers on the suggestions for new walking routes across the Proposed Development. Where possible and practicable, the Applicant has sought to include the</p>	Agreed

enhancements to the network are welcomed.

LCC would also wish to see a new PRow linking ROWS/5/1 to the highway on the western end, an enhancement to fix the gap between the legal line of Ashby De La Launde PF 11 to the highway, which have been the subject of previous discussion with the applicant, and a continuation of Cuckoo Lane that was requested at Statutory Consultation Stage.

LCC has been engaged in further discussion with the applicant since the submission of the Council's Relevant Representation and the reasons provided by the applicant in relation to ROWS/5/1 and the continuation of Cuckoo Lane are acceptable.

suggestions within the proposals. With specific reference to the suggested routes:

- A new PRow linking ROWS/5/1 to the highway on the western end : The existing missing section is informally along a track serving water utility infrastructure. Due to vehicle access and parties rights over the track (including MoD), and there being insufficient space on the track it is not possible to segregate vehicles and a PRow. The Applicant does not plan to use the access track or carry out any works to it and are therefore not removing / hindering the existing 'informal' route (which includes an unregistered section of land).
- An enhancement to fix the gap between the legal line of Ashby De La Launde PF 11 to the highway: The Applicant considers that the proposed PRow be extended by approximately 28 metres to terminate opposite the start of Ash/11/1, as set out in the **Design Commitments** [EN010149/APP/7.4] [[APP-0138](#)].
- Continuation of Cuckoo Lane: This suggestion has not been progressed due to the MoD having alternate proposals for this location not concerning the Proposed Development.

12-6	Relevant Representation	PRow enhancement	LCC recommends that the surfacing for the proposed upgrade to the existing PRow between Scopwick and	The Applicant proposes that this would include an upgrade of the existing surface conditions of the PRow to better allow user access and enjoyment to 'all-weather' standard allowing year-round	Agreed
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Blankney to bridleway status is defined to ensure that it is accessible all year round.

accessibility for non-motorised users. The surface enhancements would be secured via the **Design Commitments [EN010149/APP/7.4] [APP-0138]**.

Table 13 – Traffic and Transport

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
13-1	Relevant Representation	Transport Assessment	LCC in its capacity as Local Highway Authority has reviewed the application documents and has been involved in meetings with the applicant pre-submission. The assessment within ES Volume I - Chapter 14 (Traffic and Transport) [APP-054] and Appendix 14.1: Transport Assessment is appropriate and provides a reasonable estimate of HGV and car traffic that would be associated with the development.	This has been noted.	Agreed
13-2	Relevant Representation and Subsequent Correspondence	Draft DCO	The Local Highway Authority will require full details of the proposed junction improvements on the A15, approval through S278 of the	A Stage 1 Road Safety Audit [EN010149/APP/8.18 [REP1-075] has been submitted for the A15 junction works at Deadline 1.	Agreed

			<p>Highways Act 1980 and a bond for these major works.</p> <p>In their Response to Deadline 1 [REP2-025], LCC notes the additional wording in the oCTMP (paragraphs 5.4.1 – 5.4.5) requires all works under Articles 10 and 12 of the dDCO to be technically approved by LCC, with the two A15 junction works needing legal Agreements.</p> <p>On this basis the dDCO is acceptable (it also refers to LCC's Permitting Scheme at Article 9). In terms of highways clauses LCC are satisfied with the dDCO Rev 2.</p> <p>The submission of a stage 1 Road Safety Audit [REP1-075], as requested by the Council is also noted.</p>	<p>The Applicant updated the oCTMP [EN010149/APP/7.8.2] [REP1-062] at Deadline 1, setting out the Articles 10, 12 and 16 of the dDCO [EN010149/APP/3.1.2] [REP1-006] for the delivery of road modifications.</p> <p>It is suggested that a technical approval process, to allow the LHA the opportunity to review the necessary technical details of road works within the extents of highway adoption. This would be secured via the CTMP.</p>	Agreed
13-3	Relevant Representation, Subsequent Correspondence and ExQ1	A15/B1202 junction	<p>In their Response to Deadline 1 [REP2-025], LCC notes the updated oCTMP submitted by the Applicant at Deadline 1. LCC notes the updates</p>	<p>The Applicant updated the oCTMP [EN010149/APP/7.8.2] [REP1-062] at Deadline 1.</p> <p>The Applicant is proposing to enhance the Staff Travel Plan (contained in the CTMP) to suppress staff vehicle movements through the A15/B1202</p>	

			made to the outline Construction Traffic Management Plan (oCTMP) [REP1-062] which reflect the discussions the Council have had with the Applicant and are considered to be acceptable.	junction, place a staff movement embargo through the junction between the hours of 0700-0900 and 1600-1900 and restrict HGV movements through the junction to five HGV movements per hour per direction.	
13-4	ExQ1 Response	North Hykeham Relief Road	<p>The TA [APP-123, Paragraph 10.1.29] identifies that the North Hykeham Relief Road scheme is expected to be completed in 2028. On this basis, the Applicant considers that it is likely that the baseline levels of traffic predicted for 2028 will not materialise, thus the operation of the A15/ B1202 Junction should improve, and the overall impacts of development traffic lessened.</p> <p>The NHRR is scheduled to start construction in 2025 and be completed by 2028. It is agreed that baseline flows would be reduced if the NHRR is delivered. However, as the NHRR may be delayed other mitigation is required at this junction as</p>	<p>The Applicant believes that the use of a staff bus system will reduce overall traffic numbers operating on the road network.</p> <p>The Applicant proposes that the travel plan and working hour mitigation suggested in Question 13-3 will be appropriate should the NHRR not be fully operational by the time construction works commence.</p>	Agreed

proposed in answer to Q 1.13.3					Agreed
13-5	ExQ1 Response	Abnormal Indivisible Loads Route	LCC notes that the AIL route is acceptable.	Appendix 3 of the oCTMP [EN010149/APP/7.8.2] [REP1-062] sets out the route that Abnormal Indivisible Loads (AILs) would follow to the application site.	
13-6	ExQ1 Response	Outline Travel Plan	LCC notes that mode share targets are not necessary.	The measures proposed by the Applicant to promote sustainable modes of transport are set out in Appendix 1 of the oCTMP [EN010149/APP/7.8.2] [REP1-062].	Agreed

Table 14 – Waste

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
14-1	Statutory Consultation / Section 42 response, Relevant Representation and Subsequent Correspondence	Recycling	<p>LCC raised concerns regarding the lack of current capacity for recycling solar panels, particularly at decommissioning, but also with operational failures and cumulative impacts alongside other proposed NSIP scale solar farms, particularly in terms of waste management capacity.</p> <p>LCC has reviewed the study presented at Appendix 3 of REP2-023. Whilst we welcome the applicant's forecasts of decommissioning waste for this project and cumulatively. However, this reinforces LCC's concern over whether recycling capacity will be available. Further comments will be provided in LCC response to deadline 2 submissions at deadline 3.</p>	<p>The Applicant has undertaken a further assessment of waste, particularly related to the cumulative impacts of waste generation in combination with other known solar developments within Lincolnshire and 1km into Nottinghamshire. This study uses an absolute worst case to take account of any large scale failures of PV panels and a realistic worst case scenario against the current baseline of facilities in the region. This study is presented in Appendix 3 of the Response to Deadline 1 Submissions [REP2-023].</p> <p>The commitment to regularly review waste forecasts and identify the resultant location of any waste will be set out and updated in the final CEMP, OEMP and DEMP. This is secured within the SWMP which forms an Appendix to the oCEMP [EN010149/APP/7.7.2] [REP2-015] which has been updated at Deadline 2. The SWMP used for the operational (including maintenance) and decommissioning phase will include the measures detailed in the SWMP which</p>	Under discussion

forms an Appendix to the **oCEMP** [EN010149/APP/7.7.2] [REP2-015] and this will be updated to reflect the circumstances prevailing during the period in which operational and maintenance activities are to be carried out. This is secured within paragraph 2.10.4 of the **oOEMP** [EN010149/APP/7.10.2] [REP2-018]. and paragraph 2.10.5 of the **oDEMP** [EN010149/APP/7.13.2] [REP2-021].

Mitigation measures to ensure that waste would be managed and disposed of according to the principles of the Waste Hierarchy and that the resultant location of waste would not impact the capacity of national and regional waste disposal facilities are secured in the **oCEMP** [EN010149/APP/7.7.2] [REP2-015] and the **Site Waste Management Plan** which forms an appendix to the **oCEMP** [EN010149/APP/7.7.2] [REP2-015].

The Applicant provided an anticipated breakdown of waste streams and quantities for the operational (including maintenance) phase in **Response to the First Written Questions** [REP1-071].

Under discussion

14-2	Statutory Consultation / Section 42 response and Subsequent Correspondence	Operational waste	LCC note that operational waste could be a significant waste stream which should be considered in further details, and that waste management proposals should follow the waste hierarchy principles.
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Since this item specifically refers to operational waste, LCC would like more clarification of anticipated PV panel failure rates and thus of the quantities and waste types involved, particularly cumulatively alongside other proposed NSIP scale solar farms.

Whilst we welcome the applicant's forecasts again this reinforces LCC's concern over whether recycling capacity will be available. Any further comments will be provided in LCC response to deadline 2 submissions at deadline 3.

The commitment to regularly review waste forecasts will be set out and updated in the final OEMP. This is secured within the SWMP which forms an Appendix to the **oCEMP [EN010149/APP/7.7.2] [REP2-015]** which has been updated at Deadline 2. The SWMP used for the operational (including maintenance) and decommissioning phase will include the measures detailed in the SWMP which forms an Appendix to the **oCEMP [EN010149/APP/7.7.2] [REP2-015]** and this will be updated to reflect the circumstances prevailing during the period in which operational (including maintenance) activities are to be carried out. This is secured within paragraph 2.10.4 of the **oOEMP [EN010149/APP/7.10.2] [REP2-018]**.

Mitigation measures to ensure that waste would be managed and disposed of according to the principles of the Waste Hierarchy and that the resultant location of waste would not impact the capacity of national and regional waste disposal facilities are secured in the **oCEMP [EN010149/APP/7.7.2] [REP2-015]** and the **Site Waste Management Plan** which forms an appendix to the **oCEMP [EN010149/APP/7.7.2] [REP2-015]**.

14-3	Statutory Consultation / Section 42 response	Management Plans	<p>LCC note that it is positive to see the production of an Outline Site Waste Management Plan, oCEMP and decommissioning plan produced, despite waste being scoped out as a separate chapter.</p> <p>LCC note that whilst waste has been scoped out of the ES as a separate chapter, the inclusion of an outline Site Waste Management Plan (oSWMP), appended to the outline Construction Environment Management Plan (oCEMP) is welcomed.</p>	<p>This has been noted. The Outline Site Waste Management Plan, as appended to the Outline Construction Environment Management Plan (oCEMP) [EN010149/APP/7.7.3] [REP2-015], and Outline Decommissioning Environment Management Plan [EN010149/APP/7.13.3] [REP2-023] are provided as part of the Application.</p>	Agreed
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Table 15 – Water Environment, Surface Water, Flooding and Drainage

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
14-4	Relevant Representation	Surface Water, Flooding and Drainage	<p>The Council in its capacity as Lead Local Flood Authority (LLFA) has reviewed the application documents for this proposal. In terms of flood risk and drainage, the LLFA considers the assessment in ES Volume 1, Chapter 15 (Water)[APP-055] and in the FRA [APP-0149], the outlined mitigation measures and the requirement in the draft DCO for further details to be agreed to be reasonable.</p>	This has been noted.	Agreed

Table 16 – Draft Development Consent Order

Ref.	Source	Description of Matter	Stakeholder Comment	Applicant's Response	Status
16-1	Relevant Representation	Draft DCO	At this stage the Council reserves its position on the relevant parts of the draft DCO including the proposed requirements which are likely to be needed, to be amended or added to as the examination progresses.	This has been noted. Ongoing engagement between the Applicant and LCC is required to understand the Council position.	Under discussion
16-2	Relevant Representation	Discharging Authority	The Council has review the draft DCO to ensure that LCC's role is sufficiently recognised as a discharging authority in relation to relevant requirements and that LCC's role as Highway Authority is appropriately referred to within the draft DCO in relation to any proposed highway works or traffic regulation measures.	The newly drafted DCO meets both the Applicants and LCC requirements, this position has now been agreed.	Agreed
16-3	Relevant Representation	Drafting DCO	The Council wishes to participate in any Issue Specific Hearing in relation to the drafting of the DCO.	This has been noted.	Agreed

Signatures

This Statement of Common Ground is agreed upon:

On behalf of Lincolnshire County Council

Name:

Signature:

Date:

On behalf of the Applicant

Name:

Signature:

Date:

Appendix 1 - Draft Statement of Common Ground - Lincolnshire Fire and Rescue Service

Springwell Solar Farm

Draft Statement of Common Ground -
Lincolnshire Fire and Rescue Service

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 ('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.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by the Applicant and Lincolnshire Fire and Rescue Service.
- 1.2.2 Lincolnshire Fire and Rescue Service are a statutory stakeholder defined for the Springwell Solar Farm Development Consent Order application. They are the responding fire and rescue service covering the Proposed Development.
- 1.2.3 Collectively, the Applicant and Lincolnshire Fire and Rescue Service 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. 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').
- 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 position of the progress and agreement met or not yet met between Lincolnshire Fire and Rescue Service 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 Lincolnshire Fire and Rescue Service.
- 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:
 - “Agreed” indicates where an issue has been resolved.
 - “Not Agreed” indicates a position where both parties have reached a final position that a matter cannot be agreed between them.
 - “Under Discussion” indicates where points continue to be the subject of on-going discussions between parties.

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 DCO would, amongst other things, authorise the Applicant to construct, operate and maintain the Proposed Development. 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;
 - Battery Energy Storage System (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 development;
 - Landscaping, habitat management, biodiversity enhancement and amenity improvements; and
 - Works to facilitate vehicular access to the Site.

3. Record of Engagement

3.1. Summary of consultation

- 3.1.1. The parties have been engaged in consultation throughout the early stages of the project. Table 1 shows a summary of key engagement that has taken place between the Applicant and Lincolnshire Fire and Rescue Service in relation to the Application.

Table 1 – Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes
16 June	Email	Request to meet with Lincolnshire Fire and Rescue Service to introduce the proposals, outline best practice on EDFR sites and agree an approach to creating the Emergency Response plan.
24 August 2023	Meeting	Introduction on the Project as presented at phase one consultation and approach to collaborating on key documents.
23 January 2024	Meeting	Discussion on updated design of Springwell Solar Farm presented for phase two consultation, including water storage, run off and battery safety management plan.
Phase two consultation	Phase two consultation	Lincolnshire County Council's response included guidance from Lincolnshire F&RS.
18 March 2024	Email	Confirmation of position established on 23.01.24 in the absence of a standalone written response to phase two

consultation and request to meet later in the year.

25 March 2024	Email	Written response to the phase two consultation.
09 July 2024	Meeting	Discussion of feedback to phase two consultation, update on current parameters and assumptions and introductory conversation about protective provisions and the SoCG.



4. Current Position

Position of the Applicant and Lincolnshire Fire and Rescue Service.

- 4.1.1. The following tables set out the position of the Applicant and Lincolnshire Fire and Rescue Service, 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, and some aspects 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.

Table 2 - Topics Discussed

Ref.	Description of Matter	Stakeholder Comment	Applicant's Response	Status
1	National Fire Chief Council (NFCC) Guidance for design of Batter Energy Storage System (BESS) sites	NFCC Guidance is being used by the Lincolnshire Fire and Rescue Service as part of the project assessment. Further detail can be found in SPRI-05-MM-00109 Introduction Meeting - Lincolnshire FRS - Springwell BESS P0 P01.1	The Applicant confirms that the NFCC guidance is being used as a fundamental input to develop the design from the start. It will continue to be an input throughout the Applicant design stages into construction and operation. Further detail can be found in: <ul style="list-style-type: none"> - SPRI-05-MM-00109 Introduction Meeting - Lincolnshire FRS - Springwell BESS P0 P01.1 - SPRI-05-MM-00136 Statutory Consultation Meeting - Lincolnshire FRS - Springwell BESS P1 P01.1 - SPRI-05-MM-00157 Springwell Stakeholder Meeting Pre-DCO Submission - Lincolnshire FRS P1 P01.1 	Agreed
2	Batter Energy Storage System (BESS) Safety Standards and Chemistry Type	What standards are applied and what type of BESS being installed.	The Applicant confirms NFPA 855 is being considered in the design. Strict testing regimes for BESS are being applied to reduce the risk of thermal runaway including UL9540A alongside	Agreed

			<p>other mitigation measures. LFP Li-ion batteries are being proposed due to their better safety credentials over NMC type.</p> <p>Further detail can be found in:</p> <ul style="list-style-type: none"> - SPRI-05-MM-00109 Introduction Meeting - Lincolnshire FRS - Springwell BESS P0 P01.1 - SPRI-05-MM-00136 Statutory Consultation Meeting - Lincolnshire FRS - Springwell BESS P1 P01.1 - SPRI-05-MM-00157 Springwell Stakeholder Meeting Pre-DCO Submission - Lincolnshire FRS P1 P01.1 	
3	Drenching System	Will the BESS site use a drenching system?	The Applicant confirms there are no current plans for this type of system across this large BESS site.	Agreed
4	Refuge Area During Fire Fighting Event	Defensive stance taken during a fire event. Will there be suitable areas for responders to monitor the situation from once equipment has been set up to control the event?	The Applicant confirms that suitable areas have been identified for responders to be stationed away from any fire event.	Agreed



springwellsolarfarm.co.uk